TAX RETURN FILING INSTRUCTIONS

AMENDED FORM 990-T

FOR THE YEAR ENDING

DECEMBER 31, 2014

Prepared for	MS. JANET HOWARD MAX M. & MARJORIE S. FISHER FOUNDATION TWO TOWNE SQUARE NO. 920 SOUTHFIELD, MI 48076
Prepared by	PLANTE & MORAN, PLLC 2601 CAMBRIDGE COURT SUITE 500 AUBURN HILLS, MI 48326
Amended Result	ORIGINAL OVERPAYMENT \$ 177,708 AMENDED OVERPAYMENT \$ 258,408 ADDITIONAL CREDIT TO 2015 ESTIMATED TAX \$ 80,700
Make check Payable to	NO AMOUNT IS DUE.
Mail to	DEPARTMENT OF THE TREASURY INTERNAL REVENUE SERVICE CENTER OGDEN, UT 84201-0027
Return must be mailed on or before	AS SOON AS POSSIBLE
Special Instructions	THE RETURN SHOULD BE SIGNED AND DATED.

AMENDED RETURN

Form	990-T	E	Exempt Orga				「ax Returr	า 🏻	OMB No. 1545-0687
			=	nd proxy tax und	er se	ction 6033(e))			0044
		For ca	lendar year 2014 or other tax ye			, and ending			2014
Departr Internal	ment of the Treasury Revenue Service		► Information about F Do not enter SSN number	orm 990-T and its instructors on this form as it may	ctions is be mai	available at _{www.lrs.} Je public if vour organi	gov/form990t. zation is a 501(c)(3)		Open to Public inspection for 501(c)(3) Organizations Only
A	Check box if address changed		Name of organization (Check box if name c	hanged	and see instructions.)		DEmpi (Emp	oyer identification number loyees' trust, see
B Exe	empt under section	Print	MAX M. & MA	RJORIE S. F	TSMI	SK FOUNDATI	ON,		actions.) 8-1784340
	501(c)(3)	Or	Number, street, and room	n or suite no. If a P.O. box	k, see in	structions.			ated business activity codes nstructions.)
	408(e) 220(e)	į.	TWO TOWNE S] (333)	
	408A530(a)		City or town, state or pro		r foreigr	postal code			4.4.6
	529(a) k value of all assets	F 0	SOUTHFIELD,					211	110
at en	nd of year		exemption number (See		2	E01/a) trust	401(a) trust		Other house
H Des			ary unrelated business act			501(c) trust	401(a) trust	L	Other trust
			oration a subsidiary in an					Ye	es X No
			tifying number of the parer		ii oubon	siary controlled group:		'	A LALINO
			JANET HOWARD			Teleph	one number 🕨 2	48-	415-1440
Par	t I Unrelate	d Trac	de or Business Inc	ome		(A) Income	(B) Expense:		(C) Net
	Gross receipts or sale								
	ess returns and allo			c Balance▶	10				
			A, line 7)		2			3. 35 7	
			om line 1c		3	000 666	行生的一个主义的		000 666
			h Schedule D)		4a	922,666.		7131	922,666.
			art II, line 17) (attach Form		4b				
			ing and S paragrations (at		4c	-52,177.	STMT 2	2	E2 177
			ips and S corporations (at		6	-52,177.	SIMI Z	4	-52,177.
7 l	Inrelated deht-financ	ed incor	ne (Schedule E)	•••••	7				
			and rents from controlled o		8				
			on 501(c)(7), (9), or (17) o						
			me (Schedule I)		10				
			(J)		11				
12 (Other income (See in:	struction	s; attach schedule)		12				
	Total. Combine lines	3 throu	gh 12		13	870,489.			870,489.
Par			ot Taken Elsewhei						
	* *		utions, deductions mus				•		
			rectors, and trustees (Sche					14	
			•••••						
18 19	Tayer and licenses	iuuie) .	•••••	•••••		•••••		18	56,763.
20	Charitable contributi	ons (See	instructions for limitation	rules) STATEME	NT 2	A SEE STAT	EMENT 23	20	81,273.
		-	562)					20	01,275.
22	Less depreciation cla	aimed or	Schedule A and elsewher	e on return		22a		22b	
								23	
24	Contributions to defe	erred coi	mpensation plans					24	
25	Employee benefit pro	ograms						25	
26	Excess exempt expe	nses (So	chedule I)					26	
27	Excess readership co	osts (Scl	hedule J)					27	
28	Other deductions (at	tach sch	edule)	• • • • • • • • • • • • • • • • • • • •				28	
29	Total deductions	. Add lin	es 14 through 28					29	138,036.
			ncome before net operating					30	732,453.
31	Net operating loss de	eduction	(limited to the amount on	line 30)				31	720 450
			ncome before specific dedu					32	732,453.
33 34	Opecing deduction (uciicraily tavable	\$1,000, but see line 33 in income. Subtract line 33 in	suuctions for exceptions)	han line 22 anto-the	nollar of zara an	33	1,000.
			income. Subtract line 33 t					34	731,453.
423701	IIII OL				• • • • • • • • • • • • • • • • • • • •			34	/JI,433.

Part II	Tax Computation	190-1-1	The section of the se				- 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Annual Control of the last of	Organizations Taxable as Corporat	tions. See instructions for tax co	mputation.			S= 1-(2)	
	Controlled group members (section			ns and:			
	Enter your share of the \$50,000, \$2	•				3 = =	
	(1) \$	(2) \$	(3) \$,.	1	al TE	
	Enter organization's share of: (1) A				7	W-3	
	(2) Additional 3% tax (not more tha				1		
c	Income tax on the amount on line 3	4	Ψ		_	35c	248,694.
36	Trusts Taxable at Trust Rates. See	instructions for tax computation	Income tax on the amo	ount on line 34 t	from:	000	210,054.
1		Schedule D (Form 1041)				36	
37	Proxy tax. See instructions					37	(1200) - 300 - 00
						38	
	Total. Add lines 37 and 38 to line 35	ic or 36 whichever annies				39	248,694.
Part IV	Tax and Payments	o or ou, winescool applies	***************************************			03	240,004.
	oreign tax credit (corporations atta	ch Form 1118: trusts attach For	m 1116)	40a		E-15	
	General business credit. Attach Forn	n 3800					
d i	Credit for prior year minimum tax (a	ttach Form 8801 or 8897)		40d			
	Total credits. Add lines 40a through	1.ΔΩdi 1.01111.000 1.01.002 1		1404		40e	
41	Subtract line 40e from line 39	1 100				41	248,694.
42	Subtract line 40e from line 39 Other taxes. Check if from: Fo	rm 4255 Form 8611	Form 8607 Form	n 8866 🗍 (Ther (attach ashedula)	42	240,074.
					138	43	248,694.
	Payments: A 2013 overpayment cre					40	240,074.
	2014 estimated tax payments				210,000.	$G = 2^{-1}$	
	Tax deposited with Form 8868				300,000.	W. C.	
d i	Foreign organizations: Tax paid or w	vithheld at source (see instruction	ne)	44d	300,000		
	Backup withholding (see instruction						
	Credit for small employer health insi						
	Other credits and payments:					7/	
•	Form 4136	Other	Total	▶ 44g			
45	Total payments. Add lines 44a throu	inh 44n				45	510,000.
46	Estimated tax penalty (see instruction	ns). Check if Form 2220 is attac	hed 🕨		***************************************	46	2,898.
	Fax due. If line 45 is less than the to					47	
	Overpayment. If line 45 is larger tha					48	258,408.
	Enter the amount of line 48 you wan		ax ▶ 25	8,408.	Refunded	49	0.
Part V		g Certain Activities a	nd Other Inform	ation (see in	nstructions)		
	y time during the 2014 calendar yea	The state of the s				ount (har	k, Yes No
	ities, or other) in a foreign country?				-	•	
					_		x
2 During	unts. If YES, enter the name of the f the tax year, did the organization receive , see instructions for other forms the organ	a distribution from, or was it the grant	tor of, or transferor to, a forei	gn trust?			X
	the amount of tax-exempt interest						
Schedu	le A - Cost of Goods So	old. Enter method of inventor	ory valuation N	I/A			
***************************************	tory at beginning of year	1	6 Inventory at end o			6	
	nases	2	7 Cost of goods sol			1000	
	of labor	3	from line 5. Enter			7	
	onal section 263A costs (att. schedule)	4a	8 Do the rules of se				Yes No
	costs (attach schedule)	4b	property produce	•	•		1000 1100
	. Add lines 1 through 4b	5	the organization?	•			III.
	Under penalties of perjury, I declare that	at I have examined this return, includir	ng accompanying schedules	and statements, a	and to the best of my know	ledge and	belief, it is true,
Sign	correct, and complete. Declaration of p	reparer (other than taxpayer) is based	on all information of which p	oreparer has any k		w the IDA	footon Mic town 19
Here			EXECU	TIVE D		-	iscuss this return with nown below (see
	Signature of officer	Date	Title				X Yes No
	Print/Type preparer's name	Preparer's signa	ature	Date	Check if	1	100 [] 110
Da:d						' '''	
Paid	LYNNE M. HUISI	MANN James	Lecciman	12/22/1	2 2011 2111410300	PO	0053811
Prepai	Cinal DI ANIII		C		Firm's EIN ▶		-1357951
Use O		1 CAMBRIDGE CT		0			
		JRN HILLS, MI			Phone no. 2	48-3	75-7100
423711 01-							orm 990-T (2014)

line 8, column (A).

Form 990-T (2014)

Add columns 6 and 11.

Enter here and on page 1, Part I,

line 8, column (B).

(4)

Add columns 5 and 10.

Enter here and on page 1, Part I,

0

Schedule G - Investme (see instr		Section !	501(c)(7), (9), or (17) Or	ganizat	tion			
1. Descr	ription of income			2. Amount of income		connected schedule)	4. Set-as		5. Total deductions and set-asides (col. 3 plus col. 4)
(1)									(00.10 10.10
(2)			- 						
(3)			+						
		 							
(4)				Enter here and on page 1,					Fatanta
Tabele				Part I, line 9, column (A).					Enter here and on page 1, Part I, line 9, column (B).
				0.					0.
Schedule I - Exploited (see instru		Income	, Other	Than Advertisi	ing Inco	me			
		3. Exper	2000	4. Net income (loss)	_				7. Excess exempt
1. Description of exploited activity	2. Gross unrelated business income from trade or business	directly con with produ of unrela business in	nected uction ited	from unrelated trade or business (column 2 minus column 3). If a gain, compute cols. 5 through 7.	from act is not u	s income ivity that nrelated s income	6. Expe attributal colum	ble to	expenses (column 6 minus column 5, but not more than column 4).
(1)									
(2)									
(3)						-			
(4)	Catanhan and an	F-4b							
	Enter here and on page 1, Part I, line 10, col. (A).	Enter here a page 1, P line 10, co	arti,						Enter here and on page 1, Part II, line 26.
Totals	0.		0.		X		II.		0.
Schedule J - Advertisir									
Part I Income From I	Periodicals Rep	orted on	a Cons	olidated Basis					
Name of periodical	2. Gross advertising income		Direct sing costs	4. Advertising gain or (loss) (col. 2 minus col. 3). If a gain, comput	5. Cii	culation	6. Reader costs		7. Excess readership costs (column 6 minus column 5, but not more
	, , , , , , , , , , , , , , , , , , ,	l.		cols. 5 through 7.				. 1	than column 4).
(1)			•	11 4 1 1 W 1 1 25					
(2)								\neg	
(3)								\neg	
(4)					—			\neg	
()		_			_			-	
Tetale (corny to Dort II, line (E))		0.	0.						0
Totals (carry to Part II, line (5))				rata Basis //					0.
Part II Income From F columns 2 through	7 on a line-by-line ba		a Sepa	rate Basis (For e	each perio	dical listed i	n Part II, f	ill in	
	2.0			4. Advertising gain					7. Excess readership
1. Name of periodical	2. Gross advertising income		Direct sing costs	or (loss) (col. 2 minus col. 3). If a gain, comput cols. 5 through 7.	5. Cii	culation come	6. Reader costs	ship	costs (column 6 minus column 5, but not more than column 4).
(1)					 			$\overline{}$	
(2)				1	+			$\overline{}$	
(3)				†	 				Tin .
(4)									
		. 		<u> </u>					
Totals from Part I	100	0.	0.	4				-	0.
	Enter here and o page 1, Part I, line 11, cot. (A).	page line 11	ere and on 1, Part I, I, col. (B).						Enter here and on page 1, Part II, line 27.
Totals, Part II (lines 1-5)		0.	0.		. 4 - 1	<u> </u>			0.
Schedule K - Compens	sation of Officer	s, Direct	ors, an	d Trustees (see	instructio	ns)			
1. N	ame			2. Title		 Percent of time devoted business 			nsation attributable elated business
(1)							%		
(2)							%		
(3)							%		
(4)							%		
Total. Enter here and on page 1, Page 1	art II. line 14		'				<u> </u>		0.
The second second on page 1, 1						***************************************	<u>-5-1</u>		Form 990-T (2014)

423731 01-13-15

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Internal Revenue Service

Alternative Minimum Tax - Corporations

Attach to the corporation's tax return.

Information about Form 4626 and its separate instructions is at www.irs.gov/form4626.

OMB No. 1545-0123

Name	MAX M. & MARJORIE S. FISHER FOUNDATION,				Employer identification number
	INC.				38-1784340
	Note: See the instructions to find out if the corporation is a small corporation exempt			100	
	from the alternative minimum tax (AMT) under section 55(e).				
1	Taxable income or (loss) before net operating loss deduction			1	731,453.
2	Adjustments and preferences:				
а	Depreciation of post-1986 property			2a	
b	Amortization of certified pollution control facilities			2b	
C	Amortization of mining exploration and development costs			2c	
d	Amortization of circulation expenditures (personal holding companies only)			2d	
е	Adjusted gain or loss	• • • • • • • • • • • • • • • • • • • •		2e	
f	Long-term contracts			2f	
g	Merchant marine capital construction funds	• • • • • • • • • • • • • • • • • • • •		2g	
	Section 833(b) deduction (Blue Cross, Blue Shield, and similar type organizations only)			2h	
i	Tax shelter farm activities (personal service corporations only)			2i	
j	Passive activities (closely held corporations and personal service corporations only)			2j	
k	Loss limitations			2k	
- 1	Depletion			21	
	n Tax-exempt interest income from specified private activity bonds		······································	2m	
	Intangible drilling costs			2n	
	Other adjustments and preferences			20	
3	Pre-adjustment alternative minimum taxable income (AMTI). Combine lines 1 through 20	***************************************		3	731,453.
4	Adjusted current earnings (ACE) adjustment:		4		
	ACE from line 10 of the ACE worksheet in the instructions	4a	731,453.		
b	Subtract line 3 from line 4a. If line 3 exceeds line 4a, enter the difference as a				
	negative amount (see instructions)		0.		
	Multiply line 4b by 75% (.75). Enter the result as a positive amount	4c			
d	Enter the excess, if any, of the corporation's total increases in AMTI from prior				
	year ACE adjustments over its total reductions in AMTI from prior year ACE				
	adjustments (see instructions). Note : You must enter an amount on line 4d				
	(even if line 4b is positive)	4d		V - 34.	
е	ACE adjustment.	,		35.77	
	 If line 4b is zero or more, enter the amount from line 4c 			1 1.4	_
	• If line 4b is less than zero, enter the smaller of line 4c or line 4d as a negative amount			4e	0.
5	Combine lines 3 and 4e. If zero or less, stop here; the corporation does not owe any AMT			5	731,453.
6	Alternative tax net operating loss deduction (see instructions)			6	
7	Alternative minimum taxable income. Subtract line 6 from line 5. If the corporation held a	a residual			
	interest in a REMIC, see instructions			7	731,453.
8	Exemption phase-out (if line 7 is \$310,000 or more, skip lines 8a and 8b and enter -0- on	line 8c):			
a	Subtract \$150,000 from line 7 (if completing this line for a member of a controlled	1 1			
	group, see instructions). If zero or less, enter -0-				
	Multiply line 8a by 25% (.25)				
C	Exemption. Subtract line 8b from \$40,000 (if completing this line for a member of a control			1,000	_
	group, see instructions). If zero or less, enter -0-			8c	0.
9	Subtract line 8c from line 7. If zero or less, enter -0-			9	731,453.
10	Multiply line 9 by 20% (.20)			10	146,291.
11	Alternative minimum tax foreign tax credit (AMTFTC) (see instructions)			11	
12	Tentative minimum tax. Subtract line 11 from line 10			12	146,291.
13	Regular tax liability before applying all credits except the foreign tax credit			13	248,694.
14	Alternative minimum tax. Subtract line 13 from line 12. If zero or less, enter -0 Enter her				
	Form 1120, Schedule J, line 3, or the appropriate line of the corporation's income tax return	n		14	0.
JWA	For Paperwork Reduction Act Notice, see separate instructions.				Form 4626 (2014)

Form 4626 (2014)

* SEE ALSO

STATEMENT 26

Adjusted Current Earnings (ACE) Worksheet See ACE Worksheet Instructions.

1 Pre-adjustment AMTI. Enter the amount from	line 3 of Form 4626		1	731,453.
2 ACE depreciation adjustment		1 1	NIATE.	
		2a	7 63	
b ACE depreciation:			1115	
(1) Post-1993 property			- 314	
(2) Post-1989, pre-1994 property		92.01		
(3) Pre-1990 MACRS property				
(4) Pre-1990 original ACRS property	2b(4)		S-7 1	
(5) Property described in sections			1 (min)	
168(f)(1) through (4)		H 8 1	= 7,51	
(6) Other property		4 X 4 X	12 X5	
(7) Total ACE depreciation. Add lines 2b(1	- ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '	2b(7)	1 ==	
c ACE depreciation adjustment. Subtract line 2		•••••	2c	
Inclusion in ACE of items included in earning	s and profits (E&P):	1 1		
b Death benefits from life insurance contracts				
c All other distributions from life insurance con				
d Inside buildup of undistributed income in life		3d		
e Other items (see Regulations sections 1.56(g			前量	
			9億分	
f Total increase to ACE from inclusion in ACE of		rough 3e	3f	
Disallowance of items not deductible from E8		1 . 1		
a Certain dividends received		4a		
b Dividends paid on certain preferred stock of p				
c Dividends paid to an ESOP that are deductible		4c		
d Nonpatronage dividends that are paid and de				
1382(c)		4d		
e Other items (see Regulations sections 1.56(g				
partial list)			45	
f Total increase to ACE because of disallowanc		d lines 4a through 4e	4f	
Other adjustments based on rules for figuring		1 - 1	10210	
			FF 25	
d LIFO inventory adjustments		5d	7 199	
e Installment sales		<u>5e</u>	7/25	
f Total other E&P adjustments. Combine lines				
Disallowance of loss on exchange of debt poor	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1			
Acquisition expenses of life insurance compa				
B Depletion			8	
Basis adjustments in determining gain or loss Adjusted current earnings. Combine lines 1,			9	
	AN AL OF SHOOP STREET, AND U. L. MANY THANK	the ch and an ana ara at	1 1	

FOOTNOTES

STATEMENT

1

AMENDED RETURN

THE TAX RETURN IS BEING AMENDED AS A RESULT OF AN AMENDED K-1 PROVIDED BY AETHER REAL ASSETS I, LP. THE FOLLOWING LINE ITEMS WERE UPDATED AS A RESULT OF THE AMENDMENT:

PART I, LINE 4A PART I, LINE 5 PART II, LINE 20

22

FORM 990-T INCOME (LOSS) FROM PARTNERSHIPS AND S CORPORATIONS

STATEMENT

DESCRIPTION AMOUNT AETHER REAL ASSETS I LP 5,525. BLACKSTONE RE PARTNERS V 28,474. BLACKSTONE RE PARTNERS VII.F-NQ (AV-LH.3) -1,863. BLACKSTONE RE PARTNERS VI-NO 5,492. ENERGY CAPITAL TE-L INDIRECT 26,390. PRARIE CAPITAL V -38,169.SQUARE MILE PARTNERS III TE -5,248. TFG 2011 ARA II FUND -13,571.TFG ARTEMIS FUND -5,009.TFG NEWVEST SECONDARIES 2013 FUND 3,904. TFG OPPORTINISTIC INCOME FUND -145,882. TFG PAM III 2013 FUND -17,626.TFG SECONDARIES FUND 6,048. TFG SMP REAL ESTATE FUND -148,410.TFG US ACTIVE EQUITY LLC (F/K/A LCV) -36,379.TRIDENT V LP 64,715. BLACKSTONE RE PARTNERS VI 7,187. BLACKSTONE RE PARTNERS VI TE.2- ESH -10. BLACKSTONE RE PARTNERS VII.F (AV-LH) -3,008.BLACKSTONE RE PARTNERS VII.F (AV-LH.2) 31. BLACKSTONE RE PARTNERS VII.F (AV-LH.3) 183. BLACKSTONE RE PARTNERS VII.F (AV-LH.4) -11,345.BLACKSTONE RE PARTNERS VII.F-NQ (AV-LH) 1,147. BLACKSTONE RE PARTNERS VII.F-NQ (AV-LH.2) -93. BLACKSTONE RE PARTNERS VII.F-NQ (AV-LH.4) -1,141.DARWIN VENTURE CAPITAL FUND-OF-FUNDS II LP -21. METROPOLITAN RE PARTNERS INT'L II -1.908.NEW MOUNTAIN PARTNERS III (TIER 1) -1,366.SIGULER GUFF DISTRESSED OPP FUND II -241.SIGULER GUFF DISTRESSED OPP FUND III 327. TFG 2012 EC MEZZ FUND -9,682. TFG ARA III 2013 FUND -6,673.TFG ARTEMIS VII 2013 FUND -6,755.TFG EC III 2014 FUND -12,186.TFG ENERGY RIDGE 2013 FUND -16,268. TFG EUROPEAN REAL ESTATE FUND 66,226. TFG RAM FUND 98,858. TFG TRIDENT VI 2014 FUND -275. TFG TRIEUROPROP 2103 FUND 3 145,646. TFG VISTA 2014 FUND -618. TFG WAKKR 2012 FUND -428. THE FISHER FAIRWAY MASTER FUND, LTD. -1.086.DETROIT VENTURE PARTNERS -27,069.TOTAL TO FORM 990-T, PAGE 1, LINE 5 -52,177.

FORM 990-T	CONTRIBUTIONS	STATEMENT 2	
DESCRIPTION/KIND OF PROPERTY	METHOD USED TO DETERMINE FMV	AMOUNT	
GRANTS PAID CONTRIBUTIONS FROM K-1	N/A N/A	12,608,9	50.
ACTIVITY	N/A	3	62.
TOTAL TO FORM 990-T, PAGE 1, L	INE 20	12,609,3	12.

FORM 990-T	CON	TRIBUTIONS SUMMARY		STATEMENT	24
QUALIFIED C	CONTRIBUTIONS SUBJECT	CT TO 100% LIMIT			
CARRYOVER O	F PRIOR YEARS UNUS	ED CONTRIBUTIONS			
FOR TAX Y	EAR 2009	11,400,598			
FOR TAX Y	EAR 2010	12,981,423			
FOR TAX Y	EAR 2011	12,111,196			
FOR TAX Y	EAR 2012	11,887,447			
FOR TAX Y	EAR 2013	12,226,017			
TOTAL CARRY	OVER	4,4	60,606,681		
	NT YEAR 10% CONTRI	BUTIONS	12,609,312		
TOTAL CONTR	IBUTIONS AVAILABLE		73,215,993		
TAXABLE INC	OME LIMITATION AS A	ADJUSTED	81,273		
EXCESS 10%	CONTRIBUTIONS	-	73,134,720		
EXCESS 100%	CONTRIBUTIONS		0		
TOTAL EXCES	S CONTRIBUTIONS		73,134,720		
ALLOWABLE C	ONTRIBUTIONS DEDUCT	TION	_	81,	273
TOTAL CONTR	IBUTION DEDUCTION			81,	273

FORM 990-T NAME OF FOREIGN COUNTRY IN WHICH STATEMENT 25
ORGANIZATION HAS FINANCIAL INTEREST

NAME OF COUNTRY

CAYMAN ISLANDS IRELAND CURACAO BERMUDA

FORM 4626 AMT CONTRIBUTIONS		STATEMENT	26
CARRYOVER OF PRIOR YEARS UNUSED CONTRIBUTIONS			
FOR TAX YEAR 2009	11,400,598		
FOR TAX YEAR 2010	12,981,423		
FOR TAX YEAR 2011 FOR TAX YEAR 2012	12,111,196		
FOR TAX YEAR 2013	11,887,447 12,226,017		
TOTAL CARRYOVER		60,606,	681
CURRENT YEAR CONTRIBUTIONS		12,609,	
TOTAL CONTRIBUTIONS		73,215,	
10% OF TAXABLE INCOME AS ADJUSTED		81,	273
EXCESS CONTRIBUTIONS		73,134,	720
ALLOWABLE CONTRIBUTIONS		81,	273
AMT CHARITABLE DEDUCTION		81,	273
REGULAR CONTRIBUTION DEDUCTION		81,	273
AMT CONTRIBUTION ADJUSTMENT			0

SCHEDULE D (Form 1120)

Department of the Treasury Internal Revenue Service

Capital Gains and Losses

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

OMB No. 1545-0123

Name

MAX M. & MARJORIE S. FISHER FOUNDATION, INC.

Employer identification number

38-1784340

Part I Short-Term Capital Ga	ins and Losses - As	sets Held One Yea	r or Less		
See instructions for how to figure the amounts to enter on the lines below.	(d) Proceeds	(e) Cost	(g) Adjustments to ga or loss from Form(s) 894	in	(ħ) Gain or (loss). Subtract column (e) from column (d) and
This form may be easier to complete if you round off cents to whole dollars.	(sales price)	(or other basis)	Part I, line 2, column (9)	contain (e) from column (d) and combine the result with column (g)
1a Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 1b					
1b Totals for all transactions reported on Form(s) 8949 with Box A checked					
2 Totals for all transactions reported on			 		
Form(s) 8949 with Box B checked	ŀ				
3 Totals for all transactions reported on			 		
Form(s) 8949 with Box C checked					151,968.
4 Short-term capital gain from installment sales	from Form 6252 line 26 or 3	7	<u> </u>	4	131,300.
5 Short-term capital gain or (loss) from like-kin	d eychanges from Form 8824	***************************************		5	
6 Unused capital loss carryover (attach comput		*********************************	하면 할 일을 보는데 하게 하면 하나 없다면 하는데	6	1
7 Net short-term capital gain or (loss). Combin		h		7	151,968.
				<u>'</u>	131/3001
Part II Long-Term Capital Gai					
See instructions for how to figure the amounts to enter on the lines below.	(d) Proceeds	(e) Cost	(g) Adjustments to ga	19,	(h) Gain or (loss). Subtract column (e) from column (d) and
See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars.	(d) Proceeds (sales price)	(e)	(g) Adjustments to ga or loss from Form(s) 894 Part II, line 2, column (19,	(h) Gain or (loss). Subtract column (e) from column (d) and combine the result with column (g)
See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you	(d) Proceeds (sales price)	(e) Cost	or loss from Form(s) 894	19,	(h) Gain or (loss). Subtract column (e) from column (d) and combine the result with column (g)
See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars. 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to	(d) Proceeds (sales price)	(e) Cost	or loss from Form(s) 894	19,	(h) Gain or (loss). Subtract column (e) from column (d) and combine the result with column (g)
See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars. 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b 8b Totals for all transactions reported on Form(s) 8949 with Box D checked	(d) Proceeds (sales price)	(e) Cost	or loss from Form(s) 894	19,	(h) Gain or (loss). Subtract column (e) from column (d) and combine the result with column (g)
See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars. 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b 8b Totals for all transactions reported on Form(s) 8949 with Box D checked 9 Totals for all transactions reported on	(d) Proceeds (sales price)	(e) Cost	or loss from Form(s) 894	19,	(h) Gain or (loss). Subtract column (e) from column (d) and combine the result with column (g)
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See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars. 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b 8b Totals for all transactions reported on Form(s) 8949 with Box D checked 9 Totals for all transactions reported on Form(s) 8949 with Box E checked 10 Totals for all transactions reported on	(d) Proceeds (sales price)	(e) Cost	or loss from Form(s) 894	19,	combine the result with column (g)
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See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars. 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b 8b Totals for all transactions reported on Form(s) 8949 with Box D checked 9 Totals for all transactions reported on Form(s) 8949 with Box E checked 10 Totals for all transactions reported on Form(s) 8949 with Box F checked 11 Enter gain from Form 4797, line 7 or 9	(d) Proceeds (sales price)	(e) Cost (or other basis)	or ioss from Form(s) 894 Part II, line 2, column (s	11	combine the result with column (g)
See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars. 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b 8b Totals for all transactions reported on Form(s) 8949 with Box D checked 9 Totals for all transactions reported on Form(s) 8949 with Box E checked 10 Totals for all transactions reported on Form(s) 8949 with Box F checked 11 Enter gain from Form 4797, line 7 or 9 12 Long-term capital gain from installment sales	(d) Proceeds (sales price)	(e) Cost (or other basis)	or ioss from Form(s) 894 Part II, line 2, column (s	11 12	565,113.
See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars. 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b Totals for all transactions reported on Form(s) 8949 with Box D checked 9 Totals for all transactions reported on Form(s) 8949 with Box E checked 10 Totals for all transactions reported on Form(s) 8949 with Box E checked 11 Enter gain from Form 4797, line 7 or 9 12 Long-term capital gain from installment sales 13 Long-term capital gain or (loss) from like-kin	(d) Proceeds (sales price) from Form 6252, line 26 or 3 d exchanges from Form 8824	(e) Cost (or other basis)	or ioss from Form(s) 894 Part II, line 2, column (s	11 12 13	565,113.
See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars. 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b 8b Totals for all transactions reported on Form(s) 8949 with Box D checked 9 Totals for all transactions reported on Form(s) 8949 with Box E checked 10 Totals for all transactions reported on Form(s) 8949 with Box E checked 11 Enter gain from Form 4797, line 7 or 9 12 Long-term capital gain from installment sales 13 Long-term capital gain or (loss) from like-kin	(d) Proceeds (sales price) from Form 6252, line 26 or 3 d exchanges from Form 8824	(e) Cost (or other basis)	or ioss from Form(s) 894 Part II, line 2, column (s	11 12 13 14	565,113. 205,585.
See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars. 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b 8b Totals for all transactions reported on Form(s) 8949 with Box D checked 9 Totals for all transactions reported on Form(s) 8949 with Box E checked 10 Totals for all transactions reported on Form(s) 8949 with Box F checked 11 Enter gain from Form 4797, line 7 or 9 12 Long-term capital gain from installment sales 13 Long-term capital gain or (loss) from like-kin 14 Capital gain distributions 15 Net long-term capital gain or (loss). Combine	(d) Proceeds (sales price) from Form 6252, line 26 or 3 d exchanges from Form 8824	(e) Cost (or other basis)	or ioss from Form(s) 894 Part II, line 2, column (s	11 12 13	565,113.
See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you ound off cents to whole dollars. 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b 8b Totals for all transactions reported on Form(s) 8949 with Box D checked 9 Totals for all transactions reported on Form(s) 8949 with Box E checked 10 Totals for all transactions reported on Form(s) 8949 with Box F checked 11 Enter gain from Form 4797, line 7 or 9 12 Long-term capital gain from installment sales 13 Long-term capital gain or (loss) from like-kin 14 Capital gain distributions 15 Net long-term capital gain or (loss). Combine	(d) Proceeds (sales price) from Form 6252, line 26 or 3 d exchanges from Form 8824 e lines 8a through 14 in colum	(e) Cost (or other basis)	or ioss from Form(s) 894 Part II, line 2, column (s	11 12 13 14 15	565,113. 205,585.
See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars. 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b 8b Totals for all transactions reported on Form(s) 8949 with Box D checked 9 Totals for all transactions reported on Form(s) 8949 with Box E checked 10 Totals for all transactions reported on Form(s) 8949 with Box F checked 11 Enter gain from Form 4797, line 7 or 9 12 Long-term capital gain from installment sales 13 Long-term capital gain or (loss) from like-kin 14 Capital gain distributions 15 Net long-term capital gain or (loss). Combine Part III Summary of Parts I and	(d) Proceeds (sales price) from Form 6252, line 26 or 3 d exchanges from Form 8824 e lines 8a through 14 in colum d ii ne 7) over net long-term capita	(e) Cost (or other basis) 7 In h	or ioss from Form(s) 894 Part II, line 2, column (s	11 12 13 14 15	565,113. 205,585. 770,698.
See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars. 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b 8b Totals for all transactions reported on Form(s) 8949 with Box D checked 9 Totals for all transactions reported on Form(s) 8949 with Box E checked 10 Totals for all transactions reported on Form(s) 8949 with Box F checked 11 Enter gain from Form 4797, line 7 or 9 12 Long-term capital gain or (loss) from like-kin Long-term capital gain or (loss). Combine Part III Summary of Parts I and	(d) Proceeds (sales price) from Form 6252, line 26 or 3 d exchanges from Form 8824 e lines 8a through 14 in colum d II ne 7) over net long-term capita n capital gain (line 15) over net	(e) Cost (or other basis) 7 Il loss (line 15) t short-term capital loss (line	or icss from Form(s) 894 Part II, line 2, column (s	11 12 13 14 15	565,113. 205,585.

Note. If losses exceed gains, see Capital losses in the instructions.

JWA For Paperwork Reduction Act Notice, see the Instructions for Form 1120. Schedule D (Form 1120) (2014)

Form **8949**

Department of the Treasury

Internal Revenue Service

Sales and Other Dispositions of Capital Assets

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

OMB No. 1545-0074

2014

Attachment Sequence No. 12A

Name(s) shown on return

MAX M. & MARJORIE S. FISHER FOUNDATION, INC.

Social security number or taxpayer identification no. 38-1784340

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

instruments you bought in 2014 or later).							
Part I Short-Term. Transac Note. You may aggregate a	ill short-term transa	ctions reported on	Form(s) 1099-B sho	owing basis was repor	ted to the II	RS and for which no	adjustments or
codes are required. Enter the You must check Box A, B, or C below. If you have more short-term transactions than w			•	<u></u>			
(A) Short-term transactions than w							
(B) Short-term transactions re	•		-	•		ove)	
				reported to the IRS	•		
		T		T	Adiuetma	nt, if any, to gain or	
1 (a)	(b)	(c) Date sold or	(d) Proceeds	(e) Cost or other	loss. If y	ou enter an amount	(h) Gain or (loss).
Description of property (Example: 100 sh. XYZ Co.)	Date acquired (Mo., day, yr.)	disposed	(sales price)	basis. See the	in column	(g), enter a code in	Subtract column (e)
(Example: 100 SH. X12 Co.)	(IVIO., day, yr.)	(Mo., day, yr.)		Note below and). See instructions.	from column (d) &
		(Wo., day, yr.)		see Column (e) in the instructions	(f) Code(s)	(g) Amount of adjustment	combine the result with column (g)
AETHER REAL ASSETS	5						
I LP	VARIOUS	VARIOUS					1,576.
BLACKSTONE RE							
PARTNERS VII.F		1		-			
(AV-LH.4)	VARIOUS	VARIOUS					2,118.
BLACKSTONE RE							
PARTNERS VII.F-NQ							
(AV-LH.3)	VARIOUS	VARIOUS					44.
TFG 2011 ARA II							
FUND	VARIOUS	VARIOUS		 	•		<18.
TFG 2012 EC MEZZ	11212000	VIII. 1000		 	<u> </u>		<u> </u>
FUND	VARIOUS	VARIOUS			ļ		146,201.
TFG ARTEMIS FUND		VARIOUS			<u> </u>		243.
TFG NEWVEST	VARIOUS	VARIOUS		1			243.
SECONDARIES 2013							
FUND	VAD TOUG	TAD TOUG					200
	VARIOUS	VARIOUS					<322.>
TFG VISTA 2014	WAR TOWN	TAD TOYIG					0.106
FUND	VARIOUS	VARIOUS		<u> </u>			2,126.
	<u> </u>						
							<u> </u>
				, and the second			
	1						
2 Totals. Add the amounts in colu	umns (d). (e). (a) :	and (h) (subtract		1			
negative amounts). Enter each t							
Schedule D, line 1b (if Box A ab		- 1					
above is checked), or line 3 (if I	-						151,968.
above is officined), of fille o (ii	C above 13 C	nioched)		.1		<u> </u>	

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

423011 12-04-14 LHA For Paperwork Reduction Act Notice, see your tax return instructions.

Form 8949 (2014)

Name(s) shown on return. Name and SSN or taxpayer identification no. not required if shown on other side MAX M. & MARJORIE S. FISHER FOUNDATION, INC.

Social security number or taxpayer identification no.

38-1784340

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

Part II Long-Term. Transactions involving capital assets you held more than 1 year are long term. For short-term transactions, see page 1. Note. You may aggregate all long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the total directly on Schedule D, line 8a; you are not required to report these transactions on Form 8949 (see instructions). You must check Box D, E, or F below. Check only one box. If more than one box applies for your long-term transactions, complete a separate Form 8949, page 2, for each applicable box. If you have more long-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need.

- (D) Long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above)
- (E) Long-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS

1 (a) (b) (c) (d) (e) Description of property (Example: 100 sh. XYZ Co.) (Mo., day, yr.) (Mo.	loss. If y in column column (1	ent, if any, to gain or you enter an amount n (g), enter a code in	(h) Gain or (loss).
(Example: 100 sh. XYZ Co.) (Mo., day, yr.) disposed (sales price) basis. See the	in column column (1		Gain or (loss)
Note helew and	column (1		dull or (loss).
	1 /4%	f). See instructions.	Subtract column (e)
(Mo., day, yr.)	n (f)	(g)	from column (d) & combine the result
the instructions	''l ~ . . 、	Amount of adjustment	with column (g)
AETHER REAL ASSETS	 	adjustment	
I LP VARIOUS VARIOUS	<u> </u>		234.
BLACKSTONE RE	1		
PARTNERS V VARIOUS VARIOUS			21,369.
BLACKSTONE RE			
PARTNERS VI VARIOUS VARIOUS			11,977.
BLACKSTONE RE			
PARTNERS VII.F			
(AV-LH) VARIOUS VARIOUS			4,034.
BLACKSTONE RE			<u> </u>
PARTNERS VII.F	<u> </u>	1	
(AV-LH.2) VARIOUS VARIOUS		1	784.
BLACKSTONE RE		-	
PARTNERS VII.F	1		
(AV-LH.4) VARIOUS VARIOUS			5,984.
BLACKSTONE RE	1		
PARTNERS VII.F-NQ			
(AV-LH.3) VARIOUS VARIOUS			13.
BLACKSTONE RE			
PARTNERS VI-NQ VARIOUS VARIOUS			21,839.
ENERGY CAPITAL			
TE-L INDIRECT VARIOUS VARIOUS			65,815.
METROPOLITAN RE			
PARTNERS INT'L II VARIOUS VARIOUS			194.
SQUARE MILE	1		
PARTNERS III TE VARIOUS VARIOUS			91,787.
TFG 2011 ARA II			
FUND VARIOUS VARIOUS			7.
TFG ARTEMIS FUND VARIOUS VARIOUS			397.
TFG EUROPEAN REAL	1		
ESTATE FUND VARIOUS VARIOUS	1		306,812.
	1		
2 Totals. Add the amounts in columns (d), (e), (g) and (h) (subtract			
negative amounts). Enter each total here and include on your			
Schedule D, line 8b (if Box D above is checked), line 9 (if Box E			
above is checked), or line 10 (if Box F above is checked)			565,113.

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

Form 8949 (2014)

Attachment Sequence No. 12A Form 8949 (2014) Name(s) shown on return. Name and SSN or taxpayer identification no. not required if shown on other side Social security number or MAX M. & MARJORIE S. FISHER FOUNDATION, taxpayer identification no. INC. 38-1784340 Before you check Box D, E, or F below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either may show your basis (usually your cost) even if your broker did not report it to the IRS. Brokers must report basis to the IRS for most stock you bought in 2011 or later (and for certain debt instruments you bought in 2014 or later). Part II | Long-Term. Transactions involving capital assets you held more than 1 year are long term. For short term transactions, see page 1. Note. You may aggregate all long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the total directly on Schedule D, line 8a; you are not required to report these transactions on Form 8949 (see instructions). You must check Box D, E, or F below. Check only one box. If more than one box applies for your long-term transactions, complete a separate Form 8949, page 2, for each applicable box. nsactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need. (D) Long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above) (E) Long-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS (F) Long-term transactions not reported to you on Form 1099-B Adjustment, if any, to gain or (b) (c) (d) (e) (h) loss. If you enter an amount **Proceeds** Description of property Date acquired Date sold or Cost or other Gain or (loss). in column (g), enter a code in column (f). See instructions. (sales price) basis. See the Subtract column (e) (Example: 100 sh. XYZ Co.) (Mo., day, yr.) disposed Note below and from column (d) & (Mo., day, yr.) see Column (e) in combine the result Amount of Code(s) the instructions with column (g) adjustment TFG NEWVEST SECONDARIES 2013 FUND VARIOUS VARIOUS 33,586. TFG SECONDARIES FUND VARIOUS VARIOUS 281. Totals. Add the amounts in columns (d), (e), (g) and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, line 8b (if Box D above is checked), line 9 (if Box E

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

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

Form **2220**

Underpayment of Estimated Tax by Corporations

Attach to the corporation's tax return.

FORM 990-T

OMB No. 1545-0123

Department of the Treasury Internal Revenue Service

Information about Form 2220 and its separate instructions is at www.irs.gov/form2220

2014

Name MAX M. & MARJORIE S. FISHER FOUNDATION, INC.

Employer identification number 38-1784340

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.

F	Part I Required Annual Payment						
1	Total tax (see instructions)					1	248,694.
9 :	a Personal holding company tax (Schedule PH (Form 1120), lin	a 26) included on line 1	2a			
	b Look-back interest included on line 1 under section 460(b)(2)			Za			
	contracts or section 167(g) for depreciation under the income			2b			
	contracts of Section 107 (g) for depreciation under the income	, 1016	cast illeulou	20			
(c Credit for federal tax paid on fuels (see instructions)			2c			
	d Total. Add lines 2a through 2c				ent district carriers	2d	1
	Subtract line 2d from line 1. If the result is less than \$500, do						
	does not owe the penalty		******************************	·		3	248,694.
4	Enter the tax shown on the corporation's 2013 income tax ret	urn (see instructions). Cautio	n: If the tax is zero			
	or the tax year was for less than 12 months, skip this line a	nd ei	nter the amount from line	e 3 on line 5	***************	4	424,102.
5	Required annual payment. Enter the smaller of line 3 or line						
_	enter the amount from line 3					5	248,694.
F	Part II Reasons for Filing - Check the boxes belo	w th	at apply. If any boxes are	checked, the corporation	must file Form 22	20	
_	even if it does not owe a penalty (see instructions).						 -
6	The corporation is using the adjusted seasonal install						
7	The corporation is using the annualized income instal			an Alba malan wasanin Assa			
8	The corporation is a "large corporation" figuring its fire	st red	juired installment based o	on the prior year's tax.			
	Part III Figuring the Underpayment		(a)	(b)	(a)		(4)
9	Installment due dates. Enter in columns (a) through	\Box	(a)	(b)	(c)		(d)
٠	Installment due dates. Enter in columns (a) through (d) the 15th day of the 4th (Form 990-PF filers: Use 5th month), 6th, 9th, and 12th months of the						
	Use 5th month), 6th, 9th, and 12th months of the corporation's tax year	9	05/15/14	06/15/14	09/15/	14	12/15/14
10	Required installments. If the box on line 6 and/or line 7	١Ť	30, 20, 21	00,10,11	03,20,		22/13/11
	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% of line 5 above in each column.	10	62,174.	62,173.	62,1	74.	62,173.
11	Estimated tax paid or credited for each period (see				•		
	instructions). For column (a) only, enter the amount						
	from line 11 on line 15	11			10,0	00.	200,000.
	Complete lines 12 through 18 of one column	П					
	before going to the next column.				21		
12	Enter amount, if any, from line 18 of the preceding column	12					
	Add lines 11 and 12	13	Ligenii: Bry		10,0		200,000.
14	Add amounts on lines 16 and 17 of the preceding column	14		62,174.	124,3	47.	176,521.
15	Subtract line 14 from line 13. If zero or less, enter -0-	15	0.	0.		0.	23,479.
16	If the amount on line 15 is zero, subtract line 13 from line		reme to the				
	14. Otherwise, enter -0-	16		62,174.	114,3	<u>47.</u>	
17	Underpayment. If line 15 is less than or equal to line 10,						
	subtract line 15 from line 10. Then go to line 12 of the next						
	column. Otherwise, go to line 18	17	62,174.	62,173.	62,1	74.	38,694.
18	Overpayment. If line 10 is less than line 15, subtract line 10						e i i i i i i i i i i i i i i i i i i i
	from line 15. Then go to line 12 of the next column	18					

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 (2014)

Form 2220 (2014)

INC.

38-1784340

Page 2

	1		
Part IV	Figuring	the	Penalty

			(a)	(b)	(c)	(d)
19	Enter the date of payment or the 15th day of the 3rd month					
	after the close of the tax year, whichever is earlier (see					
	instructions). (Form 990-PF and Form 990-T filers: Use 5th month instead of 3rd month.)	19				
20	Number of days from due date of installment on line 9 to the	19				
	date shown on line 19	20				
21	Number of days on line 20 after 4/15/2014 and before 7/1/2014	21				
22		22	•	 	.	
22	Underpayment on line 17 x Number of days on line 21 x 3%	22	Φ	\$	\$	\$
23	Number of days on line 20 after 06/30/2014 and before 10/1/2014	23				
24	Underpayment on line 17 x Number of days on line 23 x 3%	24	\$	\$	\$	\$
25	Number of days on line 20 after 9/30/2014 and before 1/1/2015	25				
	Number of days on line 20 and around 14 and belone 1/ 1/2010					
26	Underpayment on line 17 x Number of days on line 25 x 3%	26	\$	\$	\$	\$
07		0.7	SEE	AUMYCHED M	ODVCUEEM	
27	Number of days on line 20 after 12/31/2014 and before 4/1/2015	21	255	ATTACHED W	ORKSHEET	
28	Underpayment on line 17 x Number of days on line 27 x 3%	28	\$	\$	 \$	s
	385					
29	Number of days on line 20 after 3/31/2015 and before 7/1/2015	29				
20	Hadamana kan lina 47 a Namban 6 daya an lina 00 a Mr	20	¢.	.	e e	
JU	Underpayment on line 17 x Number of days on line 29 x *%	30	Φ	\$	\$	\$
31	Number of days on line 20 after 6/30/2015 and before 10/01/2015	31				
32	Underpayment on line 17 x Number of days on line 31 x *%	32	\$	\$	\$	\$
33	Number of days on line 20 after 9/30/2015 and before 1/1/2016	33				
34	Underpayment on line 17 x Number of days on line 33 x *%	34	\$	 \$	\$	\$
٠.	385	-		, ,	Ψ	
35	Number of days on line 20 after 12/31/2015 and before 2/16/2016	35				
0.0			•			
36	Underpayment on line 17 x Number of days on line 35 x %	36	\$	\$	\$	\$
37	Add lines 22, 24, 26, 28, 30, 32, 34, and 36	37	\$	\$	\$	\$
				· · · · · · · · · · · · · · · · · · ·		
38	Penalty. Add columns (a) through (d) of line 37. Enter the to		•	•		
	or the comparable line for other income tax returns					\$ 2,898

^{*} 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.lrs.gov. You can also call 1-800-829-4933 to get interest rate information.

Form 2220 (2014)

FORM 990-T UNDERPAYMENT OF ESTIMATED TAX WORKSHEET

INC.	(B)	(C)	(D)	38-1784	
*Date	Amount	Adjusted Balance Due	Number Days Balance Due	Daily Penalty Rate	(F) Penalty
		-0-			
05/15/14	62,174.	62,174.	31	.000082192	158
06/15/14	62,173.	124,347.	92	.000082192	940
09/15/14	62,174.	186,521.			
09/15/14	-10,000.	176,521.	91	.000082192	1,320
12/15/14	62,173.	238,694.			
12/15/14	-200,000.	38,694.	151	.000082192	480
			0	50	
			1021 2 2		
					

^{*} Date of estimated tax payment, withholding credit date or installment due date.

412511 05-01-14

Sales of Business Property

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

Attach to your tax return.

OMB No. 1545-0184

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

MAX M. & MARJORIE S. FISHER FOUNDATION,

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

Attachment Sequence No. 27

Identifying number

	IC.						1	38-1784340
- /	Enter the gross proceeds from sales or		-	2014 on Form(s) 1	099-B or 1099-S		П	
	or substitute statement) that you are in						1	
PE	Sales or Exchanges of Other Than Casualty	of Property I	Used in a Tra	ade or Busine	ss and Involu	ntary Conv	ersi	ons From
	Other Than Casualty	Of Their-Mic	ost Property	neid More II				
	(a) Description	(b) Date acquired	(C) Date sold	(d) Gross sales	(e) Depreciation allowed or	(f) Cost or other basis, plus	ner	(g) Gain or (loss)
_	of property	(mo., day, yr.)	(mo., day, yr.)	price	allowable since acquisition	improvements a expense of sa		Subtract (f) from the sum of (d) and (e)
2					uoquisition	Oxportso of so		
							_	
C E	E STATEMENT 27						-	205 505
_				<u> </u>	l			205,585.
3	Gain, if any, from Form 4684, line 39			·····		·····	3	
4	Section 1231 gain from installment sa	ales from Form (5252, line 26 or	37		····	4	
5	Section 1231 gain or (loss) from like-k						5	
6	Gain, if any, from line 32, from other t						6	205 505
7	Combine lines 2 through 6. Enter the						7	205,585.
	Partnerships (except electing large instructions for Form 1065, Schedule	partnerships)	and S corporat	i ons. Report the g	pain or (loss) follow	ing the		
	below.	rk, ine to, or re	Jilli 1 1205, 50n	edule K, Ilrie 9. Sk	ip iiries o, 9, 11, ar	10 12		
	Individuals, partners, S corporation	shareholders.	and all others.	If line 7 is zero or	a loss, enter the a	mount		
	from line 7 on line 11 below and skip	lines 8 and 9. If	line 7 is a gain a	and you did not ha	ive any prior year s	ection		
	1231 losses, or they were recaptured				ong-term capital g	ain on		
	the Schedule D filed with your return	-					100	
8	Nonrecaptured net section 1231 loss	es from prior ye	ears (see instruc	tions)	•••••		8	
9	Subtract line 8 from line 7. If zero or le							
	line 9 is more than zero, enter the am							
	capital gain on the Schedule D filed v	vith your return	(see instructions	s)			9	205,585.
Pa	art II Ordinary Gains and L	.OSSES (see ins	structions)					
	art II Ordinary Gains and L	`	<u> </u>					
	Ordinary Gains and L Ordinary gains and losses not include	`	<u> </u>	de property held 1	year or less):			
		`	<u> </u>	de property held 1	year or less):			
		`	<u> </u>	de property held 1	year or less):			
		`	<u> </u>	de property held 1	year or less):			
		`	<u> </u>	de property held 1	year or less):			
10	Ordinary gains and losses not include Loss, if any, from line 7	ed on lines 11 th	nrough 16 (inclu				11	
10	Ordinary gains and losses not include Loss, if any, from line 7	ed on lines 11 th	nrough 16 (inclu				11 12	()
111112	Ordinary gains and losses not include Loss, if any, from line 7 Gain, if any, from line 7 or amount fro	ed on lines 11 th	nrough 16 (included)					()
11 12 13	Cordinary gains and losses not include Loss, if any, from line 7 Gain, if any, from line 7 or amount fro Gain, if any, from line 31	ed on lines 11 th	nrough 16 (included)				12 13	()
110 111 112 113	Loss, if any, from line 7 Gain, if any, from line 7 or amount fro Gain, if any, from line 31 Net gain or (loss) from Form 4684, line	ed on lines 11 th	nrough 16 (included)				12	()
110 111 112 113 114 115	Cordinary gains and losses not include Loss, if any, from line 7 Gain, if any, from line 7 or amount fro Gain, if any, from line 31 Net gain or (loss) from Form 4684, line Ordinary gain from installment sales from	m line 8, if applies 31 and 38a rom Form 6252	cable				12 13 14	
11 11 12 13 14 15	Loss, if any, from line 7 Gain, if any, from line 7 or amount fro Gain, if any, from line 31 Net gain or (loss) from Form 4684, line Ordinary gain from installment sales for Ordinary gain or (loss) from like-kind expenses.	m line 8, if applies 31 and 38a rom Form 6252 exchanges from	cable , line 25 or 36 Form 8824				12 13 14 15 16	
111 112 113 114 115 116	Loss, if any, from line 7 Gain, if any, from line 7 or amount fro Gain, if any, from line 31 Net gain or (loss) from Form 4684, line Ordinary gain from installment sales f Ordinary gain or (loss) from like-kind e Combine lines 10 through 16	m line 8, if applies 31 and 38a rom Form 6252 exchanges from	cable , line 25 or 36 Form 8824				12 13 14 15	
110 111 112 113 114 115 116	Loss, if any, from line 7 Gain, if any, from line 7 or amount fro Gain, if any, from line 31 Net gain or (loss) from Form 4684, line Ordinary gain from installment sales f Ordinary gain or (loss) from like-kind e Combine lines 10 through 16 For all except individual returns, enter	m line 8, if applies 31 and 38a rom Form 6252 exchanges from	cable , line 25 or 36 Form 8824				12 13 14 15 16	()
11 12 13 14 15 16 17	Loss, if any, from line 7 Gain, if any, from line 7 or amount fro Gain, if any, from line 31 Net gain or (loss) from Form 4684, line Ordinary gain from installment sales f Ordinary gain or (loss) from like-kind e Combine lines 10 through 16 For all except individual returns, enter	m line 8, if applies 31 and 38a rom Form 6252 exchanges from the amount from complete lines	cable form 8824 miline 17 on the a and b below:	e appropriate line	of your return and	skip lines	12 13 14 15 16	
110 111 112 113 114 115 116	Cordinary gains and losses not include Loss, if any, from line 7 Gain, if any, from line 7 or amount fro Gain, if any, from line 31 Net gain or (loss) from Form 4684, line Ordinary gain from installment sales f Ordinary gain or (loss) from like-kind e Combine lines 10 through 16 For all except individual returns, ente a and b below. For individual returns, If the loss on line 11 includes a loss fi	m line 8, if applies 31 and 38a rom Form 6252 exchanges from the amount from complete lines from Form 4684,	cable , line 25 or 36 Form 8824 m line 17 on the a and b below:	e appropriate line (b)(ii), enter that p	of your return and	skip lines	12 13 14 15 16	
11 12 13 14 15 16 17	Cordinary gains and losses not include Loss, if any, from line 7 Gain, if any, from line 7 or amount fro Gain, if any, from line 31 Net gain or (loss) from Form 4684, line Ordinary gain from installment sales f Ordinary gain or (loss) from like-kind e Combine lines 10 through 16 For all except individual returns, enter a and b below. For individual returns, If the loss on line 11 includes a loss for the part of the loss from income-prodes.	m line 8, if applies 31 and 38a rom Form 6252 exchanges from the amount from complete lines from Form 4684, ucing property of the amount from Form 4684, uci	cable initial cable cable form 8824 main line 17 on the a and b below: line 35, column on Schedule A (e appropriate line (b)(ii), enter that p	of your return and part of the loss here 8, and the part of	skip lines e. Enter	12 13 14 15 16	()
11 12 13 14 15 16 17	Loss, if any, from line 7 Gain, if any, from line 7 or amount fro Gain, if any, from line 31 Net gain or (loss) from Form 4684, line Ordinary gain from installment sales f Ordinary gain or (loss) from like-kind e Combine lines 10 through 16 For all except individual returns, enter a and b below. For individual returns, If the loss on line 11 includes a loss for the part of the loss from income-prod from property used as an employee of	m line 8, if applies 31 and 38a rom Form 6252 exchanges from the amount from complete lines from Form 4684, ucing property on Schedule A (form	cable form 8824 miline 17 on the a and b below: line 35, column on Schedule A (Form 1040), line	e appropriate line (b)(ii), enter that p Form 1040), line 2 23. Identify as fro	of your return and part of the loss here 8, and the part of m "Form 4797, line	skip lines e. Enter the loss e 18a."	12 13 14 15 16 17	
11 12 13 14 15 16 17 18	Cordinary gains and losses not include Loss, if any, from line 7 Gain, if any, from line 7 or amount fro Gain, if any, from line 31 Net gain or (loss) from Form 4684, line Ordinary gain from installment sales f Ordinary gain or (loss) from like-kind e Combine lines 10 through 16 For all except individual returns, enter a and b below. For individual returns, If the loss on line 11 includes a loss for the part of the loss from income-prod from property used as an employee of See instructions	m line 8, if applies 31 and 38a rom Form 6252 exchanges from the amount from complete lines from Form 4684, ucing property on Schedule A (form	cable initial	e appropriate line (b)(ii), enter that p Form 1040), line 2 23. Identify as fro	of your return and part of the loss here 8, and the part of the m "Form 4797, line	skip lines e. Enter the loss e 18a."	12 13 14 15 16	()
110 111 12 13 14 15 16 17 18	Loss, if any, from line 7 Gain, if any, from line 7 or amount fro Gain, if any, from line 31 Net gain or (loss) from Form 4684, line Ordinary gain from installment sales f Ordinary gain or (loss) from like-kind e Combine lines 10 through 16 For all except individual returns, enter a and b below. For individual returns, If the loss on line 11 includes a loss for the part of the loss from income-prod from property used as an employee of	m line 8, if applies 31 and 38a rom Form 6252 exchanges from the amount from complete lines rom Form 4684, ucing property on Schedule A (for 17 excluding the second secon	cable from 8824 mine 17 on the a and b below: line 35, column on Schedule A (Form 1040), line	e appropriate line (b)(ii), enter that p Form 1040), line 2 23. Identify as fro	of your return and part of the loss here 8, and the part of m "Form 4797, line ere and on	skip lines e. Enter the loss e 18a."	12 13 14 15 16 17	

418011 12-18-14

Pa	rt III Gain From Disposition of Proper	ty Ur	nder Sections 1245	5, 1250, 125	2, 12	254, and 125	5 (see	instructions)
19	(a) Description of section 1245, 1250, 1252, 1254, (a)	or 125	55 property:			(b) Date acqui (mo., day, yr		(c) Date sold (mo., day, yr.)
_A								
В								
С								
D								
	These columns relate to the properties on lines 19A through 19D.	•	Property A	Property	В	Property	С	Property D
20	Gross sales price (Note: See line 1 before completing.)	20						
21	Cost or other basis plus expense of sale	21						
22	Depreciation (or depletion) allowed or allowable	22						
23	Adjusted basis. Subtract line 22 from line 21	23						
24	Total gain. Subtract line 23 from line 20	24						
25	If section 1245 property:							
а	Depreciation allowed or allowable from line 22	25a						
b	Enter the smaller of line 24 or 25a	25b						
26	If section 1250 property: If straight line depreciation was used, enter -0- on line 26g, except for a corporation subject to section 291.							
а	Additional depreciation after 1975 (see instructions)	26a						
b	Applicable percentage multiplied by the smaller of line 24 or line 26a (see instructions)	26b						
С	Subtract line 26a from line 24. If residential rental property or line 24 is not more than line 26a, skip lines 26d and 26e	26c						
d	Additional depreciation after 1969 and before 1976	26d						
е	Enter the smaller of line 26c or 26d	26e						
f	Section 291 amount (corporations only)	26f				İ		
	Add lines 26b, 26e, and 26f	26g						·
	If section 1252 property: Skip this section if you did not dispose of farmland or if this form is being completed for a partnership (other than an electing large partnership).							-
	Soil, water, and land clearing expenses	27a						
	Line 27a multiplied by applicable percentage	27b						
	Enter the smaller of line 24 or 27b	27c				<u> </u>		
28 a	If section 1254 property: Intangible drilling and development costs, expenditures for development of mines and other natural deposits, mining exploration costs, and depletion (see instructions)	$\overline{}$						
	Enter the smaller of line 24 or 28a	28b						
а	If section 1255 property: Applicable percentage of payments excluded from income under section 126 (see instructions)	29a						
b	Enter the smaller of line 24 or 29a (see instructions)	29b						
Sur	nmary of Part III Gains. Complete property c	olumn	ns A through D through li	ne 29b before	going	to line 30.		
	Total gains for all properties. Add property columns						30	
	Add property columns A through D, lines 25b, 26g, Subtract line 31 from line 30. Enter the portion from						31	
_	from other than casualty or theft on Form 4797, line		-			•	32	
Pa	rt IV Recapture Amounts Under Section (see instructions)	ns 1	79 and 280F(b)(2) \	When Busir	ness	Use Drops t		% or Less
	(500 11 1511 140110115)					(a) Section	1	(b) Section
33	Section 179 expense deduction or depreciation allo	wable	in prior years		33	119		280F(b)(2)
	Recomputed depreciation (see instructions)				34			
	Recapture amount. Subtract line 34 from line 33. Se			r	35			

FORM 4797	PRO	OPERTY HELI	MORE THAN	ONE YEAR	STA	ATEMENT	27
DESCRIPTION	DATE ACQUIRED	DATE SOLD	SALES PRICE	DEPR.	COST OR BASIS	GAIN OR LOS	s
AETHER REAL ASSETS I LP	VARIOUS	VARIOUS				38,2	3/1
BLACKSTONE RE	VARIOUS	VARIOUS				50,2	7 = 0
PARTNERS V BLACKSTONE RE PARTNERS VII.F-NQ	VARIOUS	VARIOUS				94,6	07.
(AV-LH.3) BLACKSTONE RE	VARIOUS	VARIOUS				5	93.
PARTNERS VI-NQ ENERGY CAPITAL	VARIOUS	VARIOUS				-	86.
TE-L INDIRECT SQUARE MILE	VARIOUS	VARIOUS				-4,1	41.
PARTNERS III TE FFG 2011 ARA II	VARIOUS	VARIOUS				6,5	37.
FUND						20,6	
FG ARTEMIS FUND FFG NEWVEST SECONDARIES 2013	VARIOUS VARIOUS	VARIOUS VARIOUS					12.
FUND IFG OPPORTINISTIC	VARIOUS	VARIOUS					82.
INCOME FUND FFG SECONDARIES	VARIOUS	VARIOUS				_	13.
FUND						2	01.
FFG SMP REAL ESTATE FUND	VARIOUS	VARIOUS	維			-48,8	60.
BLACKSTONE RE PARTNERS VI	VARIOUS	VARIOUS				82,5	50.
BLACKSTONE RE PARTNERS VII.F (AV-LH)	VARIOUS	VARIOUS				6,8	30
BLACKSTONE RE PARTNERS VII.F	VARIOUS	VARIOUS				0,0	50.
(AV-LH.2) BLACKSTONE RE PARTNERS VII.F	VARIOUS	VARIOUS				4,9	45.
(AV-LH.3) BLACKSTONE RE PARTNERS VII.F	VARIOUS	VARIOUS			12	1,3	13.
(AV-LH.4) BLACKSTONE RE	VARIOUS	VARIOUS				6,0	03.
PARTNERS VII.F-NQ (AV-LH)						2,7	65.
BLACKSTONE RE PARTNERS VII.F-NQ	VARIOUS	VARIOUS					
(AV-LH.2) FFG ARTEMIS VII 2013 FUND	VARIOUS	VARIOUS					02. 11.

MAX M. & MARJORIE S. FISHER FOUND	ATION, 38-1784340
TFG EUROPEAN REAL VARIOUS VARIOUS ESTATE FUND	-6,781.

205,585.

TOTAL TO 4797, PART I, LINE 2

Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

Department of Internal Reve	of the Treasury Information about Form 8621 and its separate instructions	is at www.irs.gov/form8621	Sequence No. 69
Name of st		Identifying number (see instructions)	
INC.		38-1784340	
	treet, and room or suite no. (If a P.O. box, see instructions.) OWNE SQUARE, NO. 920	Shareholder tax year: calendar year 2014 or oth , and ending	er tax year beginning
	n, state, and ZIP code or country IFIELD, MI 48076		
	of shareholder filing the return: Individual X Corporation Partnershi	<u> </u>	Trust Estate
	assive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number (if any)	
	NT V CREDIT HOLDINGS LP TITCO TRUSTEES (CAYMAN) LIMITED		
	nter number, street, city or town, and country.) XUS WAY, CAMANA BAY, P.O. BOX 31106 SMB	Reference ID number (see instructions) TRIDENTVCREDIT	
	CAYMAN, CAYMAN ISLANDS	Tax year of PFIC or QEF: calendar year	2014 or other
		tax year beginning	, and
Part I	Summary of Annual Information (See instructions.)	ending ,	•
Provide the	following information with respect to all shares of the PFIC held by the shareholder:		
1 Des	cription of each class of shares held by the shareholder:		
	Check if shares jointly owned with spouse.		
2 Date	shares acquired during the taxable year, if applicable:		
3 Num	nber of shares held at the end of the taxable year:		
4 Valu	e of shares held at the end of the taxable year (check the appropriate box, if applicable):		
	\$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000	
(e)	If more than \$200,000, list value:		
5 Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	nder section 1291 inclusion under section	
	3, or inclusion or deduction under section 1296:	iddi bootton 1201, motdalon andor bootton	
(a)	Section 1291 \$		
(b)	Section 1293 (Qualified Electing Fund) \$		
(c)	Section 1296 (Mark to Market) \$		
Part II			
	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as		
В	election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, 1294(c) and 1294(f) and the related regulations for events that terminate this election 951.	o calculate the tax that may be deferred. , you may _{not} make this election. Also, se	-
c 🗆	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the	meaning of section
D	Deemed Sale Election . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale o	f my interest in the
E	Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess 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 DEIC to which coation 1907/d) applies of	not to troot on an avenue
۔ ایا	distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.		
G \square	Deemed Dividend Election With Respect to a Section 1297(e) PFIC. i, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the S Enter the excess distribution on line 15e,	Section 1297(e) Part V. If the excess
н 🗀	Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	iod in the stock of the former PFIC includes th	e termination date, as

Form	8621	(Rev	12-2014)	

P	Election B, also complete lines 8a through 9c. (See instructions.)	arenolders complete lines 6a through i	c. If you a	re making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a	11 2 -	
	Enter the portion of line 6a that is included in income under section 951 or that may be	-	1 2	
	excluded under section 1293(g)	6b		
C			6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF		14.00	
	Enter the portion of line 7a that is included in income under section 951 or that may be			
	excluded under section 1293(g)	7b		
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount		10 (6)	
	used for your income tax return. (See instructions.)		7c	
8 a	Add lines 6c and 7c		8a	
b	Enter the total amount of cash and the fair market value of other property distributed		30.15	
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b	100000	
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares		B B 4	
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c	7710	
d	Add lines 8b and 8c		8d	
е		ckets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includib	ble in income under section 951,	(C/A)=375	
	you may make Election B with respect to the amount on line 8e.			
9 a	Enter the total tax for the tax year (See instructions.)	9a		
	Enter the total tax for the tax year determined without regard to the amount entered		100	
	on line 8e	9b	250	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is e	extended by making	=410	
	Election B		9c	
176.95.11	art IV Gain or (Loss) From Mark-to-Market Election (See in	structions.)		
	Enter the fair market value of your PFIC stock at the end of the tax year		10a	
b	Enter your adjusted basis in the stock at the end of the tax year		10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amo	•		
	on your tax return. If a loss, go to line 11		10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))		11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu	•		
	loss on your tax return		12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the			
	Enter the fair market value of the stock on the date of sale or disposition		13a	
	Enter the adjusted basis of the stock on the date of sale or disposition		13b	
C	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as of			
	tax return. If a loss, go to line 14		13c	
	Enter any unreversed inclusions (as defined in section 1296(d))		14a	
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Inc			
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co		14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a.			
	return according to the rules generally applicable for losses provided elsewhere in the Code	and regulations	14c	
	Note See instructions in case of multiple sales or dispositions	•		

Form **8621** (Rev. 12-2014)

Part V

15 a Enter your total distributions	from the castion 1901 f			to the englischle etaal:	if the		·
holding period of the stock l						.	
b Enter the total distributions					15	a	
included in income under se	• •				,00rg		
preceding the current tax ye							
c Divide line 15b by 3. (See in						_	
d Multiply line 15c by 125% (1.23)	4han in 4ha			15		
e Subtract line 15d from line						ĺ	
If there is an excess distribu					not		
complete the rest of Part V.	-		-	current tax year. Also,			
see instructions for rules for					15	e	
f Enter gain or loss from the o				id. If a gain,			
complete line 16. If a loss, s					1	of	
16 a If there is a positive amount							
Show your holding period for				tribution or gain to each	day		
in your holding period. Add			-		9.3		
b Enter the total of the amoun			•	•			
before the foreign corporation	on became a PFIC (pre-Pf	FIC years). Enter these	e amounts on your inco	ome tax			
return as other income	***************************************				16	b	
c Enter the aggregate increase	es in tax (before credits) f	or each tax year in yo	ur holding period				
(other than the current tax y	ear and pre-PFIC years).	(See instructions.)			16	ic	
d Foreign tax credit. (See instr	ructions.)			*******************************	16	d	
e Subtract line 16d from line 1	l6c. Enter this amount on	your income tax retu	rn as "additional tax." (S	See instructions.)	16	e	
f Determine interest on each r							
					16	Sf	
Enter the aggregate amount		tructions.)					s
Enter the aggregate amount Part VI Status of F	of interest here. (See ins	tructions.) n 1294 Election	ns and Termina	tion of Section	1294 Ele	ction	
Enter the aggregate amount Part VI Status of F	of interest here. (See insi Prior Year Section eparate column for each	tructions.) n 1294 Election	ns and Termina	tion of Section	1294 Ele	ction	
Part VI Status of F Complete a se	of interest here. (See insi Prior Year Section eparate column for each	tructions.) n 1294 Election	ns and Termina	tion of Section	1294 Ele	ction: al termi	nation of the section
Part VI Status of F Complete a se	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	
Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a se 1294 election	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding election	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding election 18 Undistributed earnings to	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates 19 Deferred tax	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates 19 Deferred tax	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a set 1294 election. 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election 22 Earnings distributed or deemed	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
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Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return 24 Accrued interest due with this return 25 Deferred tax outstanding after	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return 24 Accrued interest due with this return 25 Deferred tax outstanding after partial termination of election	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section
Part VI Status of F Complete a se 1294 election 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return 24 Accrued interest due with this return 25 Deferred tax outstanding after	of interest here. (See inst Prior Year Section eparate column for each	tructions.) n 1294 Election th outstanding elec	ns and Termina tion. Complete lines	tion of Section 25 and 26 only if the	1294 Ele re is a parti	ction: al termi	nation of the section

Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

Attachment

OMB No. 1545-1002

Department of the Treasury Information about Form 8621 and its separate instructions is at www.irs.gov/form8621 Sequence No. 69 Name of shareholder Identifying number (see instructions) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Number, street, and room or suite no. (If a P.O. box, see instructions.) Shareholder tax year; calendar year 2014 or other tax year beginning TWO TOWNE SQUARE, NO. 920 and ending City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 Check type of shareholder filing the return: Individual X Corporation Partnership S Corporation Nongrantor Trust Estate Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) Employer identification number (if any) BREP VI ALBERTA FEEDER (OFFSHORE) TE.2 L.P. 77-0681521 Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) 345 PARK AVENUE 2014 or other NEW YORK, NY 10154 Tax year of PFIC or QEF; calendar year tax year beginning and ending Part I Summary of Annual Information (See instructions.) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Check if shares jointly owned with spouse. Date shares acquired during the taxable year, if applicable: Number of shares held at the end of the taxable year: Value of shares held at the end of the taxable year (check the appropriate box, if applicable): (b) \$50,001-100,000 (c) \$100,001-150,000 ___ \$150.001-200.000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296; Section 1291 \$ Section 1293 (Qualified Electing Fund) \$ (b) Section 1296 (Mark to Market) \$ (c) L Part II Elections (See instructions.) 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. 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 maynot make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election. 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. 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 15f of Part V. 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. 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 15f of Part V. 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. 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 Н 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.

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Page 2

P	art III Income From a Qualified Electing Fund (QEF). All QEF share	holders comp	lete lines 6a through 7	c. If you	are making
	Election B, also complete lines 8a through 9c. (See instructions.)				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	,				
	excluded under section 1293(g)	6b			
C	······································		•••••	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C				1/4	
	used for your income tax return. (See instructions.)			7c	
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b		10000	
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares			4.5	
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c			
d				8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack	ets)		8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	e in income u	nder section 951,		
	you may make Election B with respect to the amount on line 8e.				
	Enter the total tax for the tax year (See instructions.)	9a			
b	Enter the total tax for the tax year determined without regard to the amount entered				
	on line 8e	9b			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	-	-	76900	
	Election B			9c	
	art IV Gain or (Loss) From Mark-to-Market Election (See ins				
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
	Enter your adjusted basis in the stock at the end of the tax year			10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amou	-			
	on your tax return. If a loss, go to line 11		••••••	10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include		-	,	
40	loss on your tax return		••••••	12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the t			124	
	Enter the fair market value of the stock on the date of sale or disposition	••••••	13a 13b		
	b Enter the adjusted basis of the stock on the date of sale or disposition				
C	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ord		-		
44-	tax return. If a loss, go to line 14			13c	
	Enter any unreversed inclusions (as defined in section 1296(d))			14a	
D	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Includes an appropriate the loss of line 14a are and the loss of line 14a are and line 14a are and line 14a are and line 14a are		-		
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, cor			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. In		-		
	return according to the rules generally applicable for losses provided elsewhere in the Code a	nu regulations		14c	
	Note. See instructions in case of multiple sales or dispositions.				

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F		ns From and Disp Populate Part V for each				instructions.))
15	Enter your total distributions					the	
	holding period of the stock t						
	b Enter the total distributions	(reduced by the portions (of such distributions	s that were excess distrib	utions but not		
	included in income under se	ction 1291(a)(1)(B)) mad	e by the fund with r	espect to the applicable s	stock for each of the 3 ye	ars	
	preceding the current tax ye	ar (or if shorter, the portio	n of the shareholde	er's holding period before	the current tax year)	15b	
	Divide line 15b by 3. (See in						
	d Multiply line 15c by 125% (4.05\				1-1	
	Subtract line 15d from line 1						
	If there is an excess distribu		•		• • • • • • • • • • • • • • • • • • • •		
	complete the rest of Part V.		-	•			
	see instructions for rules for					15e	
1	Enter gain or loss from the c						
	complete line 16. If a loss, s			^		15f	
16	a If there is a positive amount						ni saidhil a Eiri
	Show your holding period for	-	•		•	av	
	in your holding period. Add						
1	Enter the total of the amount		-	-	ax vears		
	before the foreign corporation			-	*		
				_		16b	
	Enter the aggregate increase						
	(other than the current tax y					16c	
	Foreign tax credit. (See instr						
	Subtract line 16d from line 1	6c. Enter this amount on	vour income tax ret	urn as "additional tax." (S	ee instructions.)	16e	
	Determine interest on each r						
	Enter the aggregate amount					16f	
P	art VI Status of F	Prior Year Section	1294 Election	ons and Terminat	ion of Section 1	294 Elections	\$
		eparate column for eaci					
	1294 election.		J	•	,	•	
		(i)	(ii)	(iii)	(iv)	(v)	(vi)
17	Tax year of outstanding						
	election						
18	Undistributed earnings to						
	which the election relates						
19	Deferred tax						
	Interest accrued on deferred						
	tax (line 19) as of the filing date						
21	Event terminating election						
22	Earnings distributed or deemed						
	distributed during the tax year	}					
23	Deferred tax due with this						
	return						
	Accrued interest due with						
	this return						
	Deferred tax outstanding after			TOTAL DISTRICT	William Color Street		
	partial termination of election			The state of the s			
	Interest accrued after partial						
	•	r I		1 1			1

Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

Internal Rever	nue Service Information about Form 8621 and its separate instructions	IS at www.irs.gov/form8621 ·	Sequence No. 69	
Name of sh		Identifying number (see instructions)		
	. & MARJORIE S. FISHER FOUNDATION,			
INC.		38-1784340		
	reet, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other	ner tax year beginning	
TWO T	OWNE SQUARE, NO. 920	, and ending		
	n, state, and ZIP code or country IFIELD, MI 48076			
	of shareholder filing the return: Individual X Corporation Partnershi	ip S Corporation Nongrantor	Trust Estate	
	ssive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number (if any)		
BREP	VI ALBERTA FEEDER (OFFSHORE) TE.2-Q LP			
		98-0546218	·	
	nter number, street, city or town, and country.)	Reference ID number (see instructions)		
	ARK AVENUE		0014	
NEW Y	ORK, NY 10154	Tax year of PFIC or QEF: calendar year tax year beginning ending ,	2014 or other , and	
Part I	Summary of Annual Information (See instructions.)	<u></u>		
Provide the	following information with respect to all shares of the PFIC held by the shareholder:			
1 Desc	cription of each class of shares held by the shareholder:			
	Check if shares jointly owned with spouse.			
2 Date	shares acquired during the taxable year, if applicable:			
3 Num	ber of shares held at the end of the taxable year:			
	e of shares held at the end of the taxable year (check the appropriate box, if applicable): \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000		
	If more than \$200,000, list value:	, , , , , ,		
5 Type	$f e$ of PFIC and amount of any excess distribution or $\dot{f g}$ ain treated as an excess distribution ur	nder section 1291, inclusion under section		
1293	3, or inclusion or deduction under section 1296:			
(a)	Section 1291 \$			
(b)	Section 1293 (Qualified Electing Fund) \$			
(c)	Section 1296 (Mark to Market) \$			
Dord H	Flootions (O i.e.)			
Part II		OFF Ormalete Kana Continuent 7	D- / ///	
A L	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the			
Р	of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, 1294(c) and 1294(f) and the related regulations for events that terminate this election	o calculate the tax that may be deferred. , you may _{not} make this election. Also, s	• .	
c \square	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.		e meaning of section	
D	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 15f of Part V.			
E	Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess			
	excess distribution is greater than zero, also complete line 16 of Part V.			
F L_	Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	or a PFIC to which section 1297(d) applies, e day of its last tax year as a PFIC under sectio	lect to treat as an excess n 1297(a). Enter	
$G \square$	Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC gualification data and difficult in Respect to the 1.1207 (c).) 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). Edistribution is greater than zero, also complete line 16, Part V. Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former			
H	elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V.	iod in the stock of the former PFIC includes t	he termination date, as	

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FULIL	OUZI	inev.	12-20141	

Pi	Election B, also complete lines 8a through 9c. (See instructions.)	areholde	rs complete lines 6a through 7	7c. If yo	u are making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a		順.).	
b	Enter the portion of line 6a that is included in income under section 951 or that may be			8.00	
	excluded under section 1293(g)	6b		3 N	
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income			6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF			1772	
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b		<u>.</u> L	
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amou		t II of the Schedule D		
	used for your income tax return. (See instructions.)			7c	
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed	1			
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b		White	Č.
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares			EM.	
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c		and the	
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in bra	ckets)	•••••	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includi	ble in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.				
9 a	Enter the total tax for the tax year (See instructions.)	9a		30,50	
b	Enter the total tax for the tax year determined without regard to the amount entered				
	on line 8e				
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is	extended	d by making		
	Election B			9c	
1.000	art IV Gain or (Loss) From Mark-to-Market Election (See in			·····	
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
	Enter your adjusted basis in the stock at the end of the tax year			10b	
	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am		•		
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc		•		
	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-			
	Enter the fair market value of the stock on the date of sale or disposition			13a	
	Enter the adjusted basis of the stock on the date of sale or disposition			13b	
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as o	•	,		
	tax return. If a loss, go to line 14			13c	
	Enter any unreversed inclusions (as defined in section 1296(d))			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In			ا ا	
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, o			14b	
	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a.		-	ا . [
	return according to the rules generally applicable for losses provided elsewhere in the Cod	e and reg	Julations	14c	
	Note. See instructions in case of multiple sales or dispositions.				

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Part V					on 1291 Fund (See in	structions.)	
			ach excess distribution				
					to the applicable stock. If the		
						15a	
	•		ns of such distributions				
					stock for each of the 3 years		
					e the current tax year)		
d Multiply II	ne 15c by 125% (1.	.25)				. 15d	
If there is	an excess distributi	on, complete line 16.	If zero or less and you	did not dispose of stoc	spect to the applicable stock. k during the tax year, do not		
=		-		-	e current tax year. Also,	45.	
		-	s distribution on your in a section 1291 fund or f	*****	nd If a gain	15e	
			do not complete line 16			15f	
					ibution and disposition.		
			•		tribution or gain to each day		
in your ho	olding period. Add a	II amounts that are all	ocated to days in each t	ax year.	,		
b Enter the	total of the amounts	determined in line 16	Sa that are allocable to t	he current tax year and	tax years		
before the	foreign corporation	n became a PFIC (pre-	PFIC years). Enter thes	e amounts on your inc	ome tax		
return as	other income					16b	
c Enter the	aggregate increases	in tax (before credits) for each tax year in yo	ur holding period			
					•••••		
d Foreign ta	x credit. (See instru	ctions.)				16d	
e Subtract I	ine 16d from line 16	ic. Enter this amount	on your income tax retu	ırn as "additional tax." (See instructions.)	16e	
			rmined on line 16e usin	T			
	aggregate amount o	of interest here. (See in	nstructions.)			. 16f	
Part VI					ntion of Section 129		
		oarate column for e	ach outstanding elec	tion. Complete lines	25 and 26 only if there is	a partial termina	ation of the section
	1294 election.	(2)	(1)				
47 Taurusan ad		(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of							
	od corpings to		-				
18 Undistribut	election relates						
WHIGH THE C	rection relates						
19 Deferred ta	x			•			
20 Interest accru							
	s of the filing date						
21 Event term	inating election						
22 Earnings dist	ributed or deemed						
distributed d	uring the tax year						
23 Deferred ta	x due with this						*
return							
24 Accrued in this return	terest due with						
25 Deferred tax							
partial termin	ation of election				= =		
26 Interest acc	crued after partial						
termination	of election						

Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

Internal R	venue Service Information about Form 8621 and its separate instructions	is at www.irs.gov/form8621	Sequence No. 69
	shareholder	Identifying number (see instructions)	
	M. & MARJORIE S. FISHER FOUNDATION,		
INC.		38-1784340	
	street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other	er tax year beginning
	TOWNE SQUARE, NO. 920	, and ending	
SOUT	wn, state, and ZIP code or country HFIELD, MI 48076		
	pe of shareholder filing the return: 🔲 Individual 🗶 Corporation 🔛 Partnersh		Trust Estate
	passive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number (if any)	
	E POINT CREDIT PARTNERS SUB, LTD		
	(Enter number, street, city or town, and country.)	Reference ID number (see instructions)	
	EXUS WAY, 2ND FLOOR, CAMANA BAY	EAGLEPOINTCREDITSUB	0044
GRAN	D CAYMAN, CAYMAN ISLANDS KY1-1205	Tax year of PFIC or QEF: calendar year	2014 or other
		tax year beginning	, and
Part	Summary of Annual Information (See instructions.)	ending ,	•
	the following information with respect to all shares of the PFIC held by the shareholder:		
	escription of each class of shares held by the shareholder:		
, ,	Check if shares jointly owned with spouse.		
	onlock it onlarge joining owned was speaked.		
2 D	ate shares acquired during the taxable year, if applicable:		
3 N	umber of shares held at the end of the taxable year:		
4 V	alue of shares held at the end of the taxable year (check the appropriate box, if applicable):		
	\$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000	
•) If more than \$200,000, list value;	(-,, ,, ,, ,	
•			
5 Ty	pe of PFIC and amount of any excess distribution or gain treated as an excess distribution u	nder section 1291, inclusion under section	
13	293, or inclusion or deduction under section 1296:		
(8) Section 1291 \$		
(1)) Section 1293 (Qualified Electing Fund) \$		
(0	Section 1296 (Mark to Market) \$		
Part			
<u> </u>	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	,	
В∟	Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend to of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred. , you may _{not} make this election. Also, se	
c 🗆	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mar 1296(e). Complete Part IV.		e meaning of section
D	Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale o	f my interest in the
E	Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a		
	amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	aistribution. Enter this amount on line 15e	of Part V. If the
F 🗔	Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.		
G [Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Edistribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the S	Section 1297(e)
н 🗆	Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 156 complete line 16, Part V.	riod in the stock of the former PFIC includes th	e termination date, as

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rorm	8621	(HeV.	12-2014)

Pa	art III Income From a Qualified Electing Fund (QEF). All QEF sh Election B, also complete lines 8a through 9c. (See instructions.)	areholders co	mplete lines 6a through 7	c. If you	are making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a		N CE	
	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b		M = 100	
C		_		6с	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a		HATCH I	
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount	nt in Part II o	f the Schedule D		
	used for your income tax return. (See instructions.)			7c	
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				· · · · ·
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c		7 (4)	
d	Add lines 8b and 8c			8d	
е		ckets)		8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is include	ble in incom	e under section 951,	纵箧	
	you may make Election B with respect to the amount on line 8e.			litera	
	Enter the total tax for the tax year (See instructions.)	9a			
b	Enter the total tax for the tax year determined without regard to the amount entered			7.40	
	on line 8e				
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is	extended by	making	120 ALS 14 EZ	
	Election B			9c	
A 100 A 700	art IV Gain or (Loss) From Mark-to-Market Election (See in				
10a	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
	Enter your adjusted basis in the stock at the end of the tax year			10ь	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am		•		
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc		•	,	
	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during th	•			
a	Enter the fair market value of the stock on the date of sale or disposition			13a	
	Enter the adjusted basis of the stock on the date of sale or disposition			13b	
C	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as	-	-		
	tax return. If a loss, go to line 14			13c	
	Enter any unreversed inclusions (as defined in section 1296(d))			14a	
D	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In				
_	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a,			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a		-	,,	
	return according to the rules generally applicable for losses provided elsewhere in the Cod Note. See instructions in case of multiple sales or dispositions.	e and regulat	uns	14c	
	NOTE SEE INSTRUCTIONS IN CASE OF MINURINE SAIES OF DISHOSHORS				

Form **8621** (Rev. 12-2014)

Part V Distributi	ons From and Dis	positions of	Stock of a Section	on 1291 Fund (See ins	tructions	.)
	separate Part V for eac					
15 a Enter your total distribution						
holding period of the stock	15a					
b Enter the total distributions						
				e stock for each of the 3 years		
preceding the current tax y	ear (or if shorter, the porti	on of the sharehold	er's holding period befo	re the current tax year)	15b	
c Divide line 15b by 3. (See i	nstructions if the number	of preceding tax yea	rs is less than 3.)		15c	
d Multiply line 15c by 125%	(1.25)				15d	
e Subtract line 15d from line	15a. This amount, if more	than zero, is the ex	cess distribution with re	spect to the applicable stock.		
If there is an excess distrib	ution, complete line 16. If	zero or less and you	u did not dispose of stoo	k during the tax year, do not		
complete the rest of Part V	. See instructions if you re	ceived more than o	ne distribution during th	e current tax year. Also,		
see instructions for rules fo	or reporting a nonexcess o	listribution on your	income tax return		15e	
f Enter gain or loss from the						
complete line 16. If a loss,	show it in brackets and do	not complete line 1	16		15f	
16 a If there is a positive amoun	it on line 15e or 15f (or bo	th), attach a statem				
Show your holding period	for each share of stock or	block of shares held	d. Allocate the excess dis	stribution or gain to each day		
in your holding period. Add	d all amounts that are alloc	ated to days in each	ı tax year.			
b Enter the total of the amount	nts determined in line 16a	that are allocable to	the current tax year and	l tax years		
before the foreign corporat	tion became a PFIC (pre-P	FIC years). Enter the	ese amounts on your inc	ome tax		
return as other income					16b	
c Enter the aggregate increas						
(other than the current tax	year and pre-PFIC years).	(See instructions.)			16c	
					16d	
e Subtract line 16d from line	16c. Enter this amount on	your income tax re	turn as "additional tax." ((See instructions.)	16e	
f Determine interest on each						
Enter the aggregate amoun	nt of interest here. (See ins	tructions.)		<u> </u>	16f	
				ation of Section 1294	Election	S
Complete a s	separate column for eac	ch outstanding ele	ection. Complete lines	s 25 and 26 only if there is a	partial term	ination of the section
1294 election	n.					
	(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of outstanding		•				
election						
18 Undistributed earnings to						
which the election relates						
19 Deferred tax						
20 Interest accrued on deferred						
tax (line 19) as of the filing date						
21 Event terminating election						
22 Earnings distributed or deemed						
distributed during the tax year						
23 Deferred tax due with this				9		
return						
24 Accrued interest due with						
this return						
25 Deferred tax outstanding after			E SHAME SHIP SHEET		1 11.89	N 20 10 2 2 1 1 2 1 2 1 2 1 2 1 2 1 2 1 2
partial termination of election						
26 Interest accrued after partial						
termination of election						
						0004 (5 40 004 4)

Internal Revenu	e Service Information about Form 8621 and its separate instructions		Sequence No. 69			
Name of shar		Identifying number (see instructions)				
	& MARJORIE S. FISHER FOUNDATION,					
INC.		38-1784340				
	et, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or oth	ner tax year beginning			
TWO TO	WNE SQUARE, NO. 920	, and ending	1 .			
	state, and ZIP code or country 'IELD, MI 48076					
	f shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor	Trust Estate			
	sive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number (if any)				
EAGLE	POINT CREDIT PARTNERS SUB II, LTD					
Address (Ent	er number, street, city or town, and country.)	Reference ID number (see instructions)				
89 NEX	US WAY, 2ND FLOOR, CAMANA BAY	EAGLEPOINTCREDITSUB:	II			
GRAND	CAYMAN, CAYMAN ISLANDS KY1-1205	Tax year of PFIC or QEF: calendar year	2014 or other			
		tax year beginning	, and			
		ending ,	•			
Part I	Summary of Annual Information (See instructions.)					
	ollowing information with respect to all shares of the PFIC held by the shareholder:					
1 Descri	ption of each class of shares held by the shareholder:					
	Check if shares jointly owned with spouse.					
2 Date s	hares acquired during the taxable year, if applicable:					
3 Numbe	er of shares held at the end of the taxable year:					
3 Number	or of shares field at the end of the taxable year.					
4 Value	of shares held at the end of the taxable year (check the appropriate box, if applicable):					
(a) [\$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000				
(e) If	more than \$200,000, list value:					
5 Type o	of PFIC and amount of any excess distribution or gain treated as an excess distribution un	der section 1291, inclusion under section	S•			
1293,	or inclusion or deduction under section 1296:					
(a)	Section 1291 \$					
(b)	Section 1293 (Qualified Electing Fund) \$					
(c) L	Section 1296 (Mark to Market) \$					
Part II	Elections (See instructions.)					
	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as					
C I	Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, 1294(c) and 1294(f) and the related regulations for events that terminate this election 951.	o calculate the tax that may be deferred. you may _{not} make this election. Also, se	,			
C	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark		e meaning of section			
	1296(e). Complete Part IV. 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 o	of my interest in the			
	PFIC. Enter gain or loss on line 15f of Part V.					
а	Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	• • • • • • • • • • • • • • • • • • • •	**			
C	Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.					
u ∟ ₁ F	Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of I.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d).) PFIC. My holding period in the stock of the S	Section 1297(e)			
H 🗆 8	distribution is greater than zero, also complete line 16, Part V. Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	iod in the stock of the former PFIC includes th	ne termination date, as			

Form 8621 (Rev. 12-2014)	

P	art III Income From a Qualified Electing Fund (QEF). All QEF sh Election B, also complete lines 8a through 9c. (See instructions.)	areholders complete lines 6a through	7c. If you are	making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	. 6a	BAR	
	Enter the portion of line 6a that is included in income under section 951 or that may be			
	excluded under section 1293(g)	_ 6b		
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income		6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a		
b	Enter the portion of line 7a that is included in income under section 951 or that may be			
	excluded under section 1293(g)	. 7b		
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount		1166	
	used for your income tax return. (See instructions.)		7c	
8 a	Add lines 6c and 7c		8a	
b	Enter the total amount of cash and the fair market value of other property distributed			
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	. 8b		
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares			
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year			
d			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in bra	ickets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is include	ible in income under section 951,		
	you may make Election B with respect to the amount on line 8e.			
	Enter the total tax for the tax year (See instructions.)	9a		
b	Enter the total tax for the tax year determined without regard to the amount entered		5 5	
	on line 8e			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is			
_	Election B		9c	
	art IV Gain or (Loss) From Mark-to-Market Election (See in		T	
10a	Enter the fair market value of your PFIC stock at the end of the tax year		10a	
	Enter your adjusted basis in the stock at the end of the tax year		10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am	•		
	on your tax return. If a loss, go to line 11		10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))		11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc.			
	loss on your tax return		12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the			
a	Enter the fair market value of the stock on the date of sale or disposition		13a	
	Enter the adjusted basis of the stock on the date of sale or disposition		13b	
C	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as		40	
44-	tax return. If a loss, go to line 14		13c	
			148	
D			445	
_			140	
C			44.	
	return according to the rules generally applicable for losses provided elsewhere in the Cod Note: See instructions in case of multiple sales or dispositions	e and regulations	14C	85
b	Enter any unreversed inclusions (as defined in section 1296(d)) Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a return according to the rules generally applicable for losses provided elsewhere in the Cod	clude this amount as an ordinary complete line 14c . Include this amount on your tax	14a 14b	

Part V					on 1291 Fund (Se	e instructi	ions.)	
		aparate Part V for each						
					t to the applicable stock.			
						15a		
		(reduced by the portions						
					e stock for each of the 3			
					re the current tax year)			
							1	
	line 15c by 125% (1							
If there i complet	s an excess distribue the rest of Part V.	tion, complete line 16. l	f zero or less and you eceived more than on	did not dispose of stoo ne distribution during th	espect to the applicable so ck during the tax year, do ne current tax year. Also,	o not		
		lisposition of stock of a	· -	••••		100		
_		how it in brackets and d			, , , , , , , , , , , , , , , , , , ,	15f	:	
16 a If there i	s a positive amount	on line 15e or 15f (or b	oth), attach a stateme	nt for each excess dist	ribution and disposition.	100		
Show yo	our holding period fo	or each share of stock o	r block of shares held	. Allocate the excess di	stribution or gain to eacl	n day		
in your h	nolding period. Add	all amounts that are allo	cated to days in each	tax year.				
b Enter the	e total of the amount	ts determined in line 16	a that are allocable to	the current tax year and	d tax years			
before th	ne foreign corporatio	on became a PFIC (pre-F	PFIC years). Enter the	se amounts on your inc	come tax	100		
return as	s other income					16b		
		es in tax (before credits)						
d Foreign	tax credit. (See instr	uctions.)				16d		
					(See instructions.)	16e		
		net increase in tax deteri		-		404		
					ation of Soction			
Part VI					ation of Section			
	1294 election.		ich outstanding eie	ction. Complete iine:	s 25 and 26 only if the	re is a partial	i terminatio	on or the section
	1234 election.	(i)	(ii)	(iii)	(iv)	(v)		(vi)
	of outstanding	. (1)	("/	(,	(.,	(4)		(41)
	uted earnings to							
	election relates						-	
	tax							
	arued on deferred) as of the filing date				1			
21 Event terr	minating election							
_	stributed or deemed							
	during the tax year							
return	tax due with this			St #=5				
	nterest due with n		·					
	x outstanding after	1000					75. 智爾·卡	YANG BURNES
	ination of election							
26 Interest a	ccrued after partial							<u>-</u>
terminatio	on of election							

Internal	Revenue Service Information about Form 8621 and its separate instructions	is at www.irs.gov/form8621	Sequence No. 69			
	of shareholder	Identifying number (see instructions)	<u> </u>			
	M. & MARJORIE S. FISHER FOUNDATION,					
INC		38-1784340				
	er, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other	er tax year beginning			
	TOWNE SQUARE, NO. 920	, and ending	, .			
	town, state, and ZIP code or country THFIELD, MI 48076					
	type of shareholder filing the return: Individual X Corporation Partnersh	ip S Corporation Nongrantor	Trust Estate			
	of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number (if any)	THE COURT			
	DENT V CREDIT SPECIAL HOLDINGS A, LLC					
Addre	s (Enter number, street, city or town, and country.)	Reference ID number (see instructions)	2			
	NEXUS WAY, CAMANA BAY, P.O. BOX 31106 SMB	TRIDENTVCREDITSPECIA				
GRA	ND CAYMAN, CAYMAN ISLANDS	Tax year of PFIC or QEF: calendar year	2014 or other			
		tax year beginning	, and			
Do	the Common of Annual Information (Continue tions)	ending ,				
Provid	Summary of Annual Information (See instructions.) e the following information with respect to all shares of the PFIC held by the shareholder:					
	Description of each class of shares held by the shareholder:					
•	Check if shares jointly owned with spouse.					
2	Date shares acquired during the taxable year, if applicable:					
3	Number of shares held at the end of the taxable year:					
4	Value of shares held at the end of the taxable year (check the appropriate box, if applicable):					
	(a) \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000				
	(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 u	nder section 1291, inclusion under section				
	1293, or inclusion or deduction under section 1296:					
	(a) Section 1291 \$					
	(c) Section 1296 (Mark to Market) \$					
	(v) oscillative (mainte)					
Pa	t II Elections (See instructions.)					
A	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 P	art III.			
В	Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 95	to calculate the tax that may be deferred. I, you maynet make this election. Also, se	• .			
_ [1294(c) and 1294(f) and the related regulations for events that terminate this e	lection.				
C L	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mai 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the	e meaning of section			
D	Deemed Sale Election . I, a shareholder on the first day of a PFIC's first tax year as a QEI PFIC. Enter gain or loss on line 15f of Part V.	-, elect to recognize gain on the deemed sale o	f my interest in the			
E [Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess 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 distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.					
G [Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). I distribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the S	Section 1297(e)			
н [Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding pedefined in Regulations section 1.1298-3(d). Enter the excess distribution on line 150 complete line 16, Part V.	riod in the stock of the former PFIC includes th	e termination date, as			

_			
Form	8621	(Rev	12-2014)

	Election B, also complete lines 8a through 9c. (See instructions.)	complete lines ba tilrough 7c.	ir you are mai	ang
6 a	Enter your pro rata share of the ordinary earnings of the QEF 6a		132	
	Enter the portion of line 6a that is included in income under section 951 or that may be			
	excluded under section 1293(g) 6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income		6c	
	Enter your pro rata share of the total net capital gain of the QEF 7a	1		
b	Enter the portion of line 7a that is included in income under section 951 or that may be			
	excluded under section 1293(g) 7b	8		
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount in Part I	of the Schedule D	<u>;=</u> 11	
	used for your income tax return. (See instructions.)		7c	
8 a	Add lines 6c and 7c		Ва	
b	Enter the total amount of cash and the fair market value of other property distributed	1/4	55%	
	or deemed distributed to you during the tax year of the QEF. (See instructions.)			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares	ě.	1,2	
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year 8c	3		
d	Add lines 8b and 8c		8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets)		Be	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible in inco			
	you may make Election B with respect to the amount on line 8e.			
9 a	Enter the total tax for the tax year (See instructions.)			
	Enter the total tax for the tax year determined without regard to the amount entered	i i		
	on line 8e 9b	Ť		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended b	y making		
	Election B		9c	
ANTI-	art IV Gain or (Loss) From Mark-to-Market Election (See instruction			
10a	Enter the fair market value of your PFIC stock at the end of the tax year		10a	
b	Enter your adjusted basis in the stock at the end of the tax year		10Ь	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ord	linary income		
	on your tax return. If a loss, go to line 11		0c	
	Enter any unreversed inclusions (as defined in section 1296(d))		11	
	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this an			
	loss on your tax return		12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:	II.	- 1	
а	Enter the fair market value of the stock on the date of sale or disposition		3a	
	Enter the adjusted basis of the stock on the date of sale or disposition		3b	
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary inc	ome on your		
	tax return. If a loss, go to line 14	· · · · · · · · · · · · · · · · · · ·	3c	
14a	Enter any unreversed inclusions (as defined in section 1296(d))		4a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this a			
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete lir		4b	
	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include th			
	return according to the rules generally applicable for losses provided elsewhere in the Code and regul	ations	4c	
	Note. See instructions in case of multiple sales or dispositions.	•		

Part V					on 1291 Fund (See i	nstruction	s.)
		parate Part V for each					
					to the applicable stock. If the		
holding	period of the stock t	pegan in the current tax y	ear, see instructions			15a	····
		reduced by the portions					
					stock for each of the 3 year		
					re the current tax year)		
d Multiply	line 15c by 125% (*	1.25)				15d	
If there is	s an excess distribue the rest of Part V.		zero or less and you ceived more than one	did not dispose of stoc e distribution during th	spect to the applicable stocled during the tax year, do not e current tax year. Also,	t	
		lisposition of stock of a s how it in brackets and do		•	nd. If a gain,	15f	
16 a If there is Show yo in your h b Enter the	s a positive amount ur holding period fo olding period. Add a total of the amount	on line 15e or 15f (or bo	th), attach a statemen block of shares held. ated to days in each that are allocable to t	nt for each excess distr Allocate the excess distax year. the current tax year and	ibution and disposition. stribution or gain to each da d tax years		
return as	other income	•••••		•••••		16b	
		s in tax (before credits) f					
d Foreign t	ax credit. (See instr	uctions.)		•••••		16d	
e Subtract	line 16d from line 1	6c. Enter this amount on	your income tax retu	ırn as "additional tax." ((See instructions.)	16e	·
		et increase in tax determ					
Part Vi					ation of Section 12		
			h outstanding elec	tion. Complete lines	s 25 and 26 only if there i	s a partial ter	mination of the section
	1294 election.	,					
•		(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of election	of outstanding						
	ited earnings to election relates						
19 Deferred t	ax						
20 Interest acc	rued on deferred as of the filing date						
21 Event tern	ninating election						
	stributed or deemed						
	during the tax year				2		
	ax due with this		(i)				
return							
	nterest due with						
	outstanding after				and the state of the state of		
partial termi	nation of election				- All Indiana Control India		
	crued after partial						
	n of election						

Department of the Treasury Internal Revenue Service	mation about Form 8621 and its separate instructions	is at www.irs.gov/form8621	Attachment Sequence No. 69
Name of shareholder		Identifying number (see instructions)	
MAX M. & MARJORIE S.	FISHER FOUNDATION,		
INC.		38-1784340	
Number, street, and room or suite no. (If a P.C TWO TOWNE SQUARE, NO		Shareholder tax year: calendar year 2014 or oth	ner tax year beginning
City or town, state, and ZIP code or country	• 920	and ending	, ,
SOUTHFIELD, MI 4807	6		
Check type of shareholder filing the return:	Individual X Corporation Partnersh	ip S Corporation Nongrantor	Trust Estate
Name of passive foreign investment company		Employer identification number (if any)	
EAGLE POINT CREDIT NO	ON US, LP	00 1003310	
Address (Enter number, street, city or town, an	nd country)	98-1083310 Reference ID number (see instructions)	
89 NEXUS WAY, CAMANA		Reference in number (see instructions)	
GRAND CAYMAN, CAYMAN		Tax year of PFIC or QEF: calendar year	2014 or other
		tax year beginning	, and
		ending ,	
	Information (See instructions.)		
- · · · · · · · · · · · · · · · · · · ·	to all shares of the PFIC held by the shareholder:		
Check if shares jointly owned wit	by the shareholder:		
Oncok ii shares johnly owned wh	ii apouac.		
2 Date shares acquired during the taxable	e year, if applicable:		
3 Number of shares held at the end of the	taxable year:		
4 Value of shares held at the end of the ta	exable year (check the appropriate box, if applicable):		
	\$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000	
	(4)	(4) (4) (4)	
-			
5 Type of PFIC and amount of any excess	distribution or gain treated as an excess distribution u	nder section 1291, inclusion under section	
1293, or inclusion or deduction under s	ection 1296:		
(a) Section 1291 \$	ting Fund) &		
· · · · · · · · · · · · · · · · · · ·	eting Fund) \$ et) \$		
(a) obtain 1250 (main to main	υ., Ψ		
Part II Elections (See instru			
	NEF. I, a shareholder of a PFIC, elect to treat the PFIC as		
B Election To Extend Time For Pay	ment of Tax. I, a shareholder of a QEF, elect to extend t minated. Complete lines 8a through 9c of Part III to	the time for payment of tax on the undistribute	ed earnings and profits
Note: If any portion of line 6a o	or line 7a of Part III is includible under section 951 elated regulations for events that terminate this el	. vou mavnot make this election. Also, se	ee sections
	sated regulations for events that terminate this ele: Stock. I, a shareholder of a PFIC, elect to mark-to-mark		e meaning of section
1296(e). Complete Part IV.	The state of the s	NOT ALL THE GLOOK MALE IS THAN COMBINE WITHIN TH	·
D Deemed Sale Election. I, a share	holder 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			
	hareholder on the first day of a PFIC's first tax year as a post-1986 earnings and profits of the CFC as an excess		
, , ,	than zero, also complete line 16 of Part V.	uisu toution. Enter this amount on line 156	e or Part V. II the
	eemed Sale of PFIC. I, a shareholder of a former PFIC	or a PEIC to which section 1297(d) applies e	lect to treat as an excess
distribution the gain recognized or	n the deemed sale of my interest in the PFIC on the last		
gain on line 15f of Part V.	Decreation Continue 4007(-) BEIO Lande Hall	1007/c\ PFIO : 341 : 1	A Demolation of the
G Deemed Dividend Election With 1.1297-3(a), elect to make a deem	Respect to a Section 1297(e) PFIC. I, a shareholder of ned dividend election with respect to the Section 1297(e	a section 1297(e) PFIC, within the meaning o e) PFIC. My holding period in the stock of the	n Hegulations section Section 1297(e)
PFIC includes the CFC qualification	n date, as defined in Regulations section 1.1297-3(d). E o, also complete line 16, Part V.	Enter the excess distribution on line 15e,	Part V. If the excess
Deemed Dividend Election With	Respect to a Former PFIC. I, a shareholder of a former	PFIC, within the meaning of Regulations sect	tion 1.1298-3(a).
elect to make a deemed dividend e	election with respect to the former PFIC. My holding per 298-3(d). Enter the excess distribution on line 15e	riod in the stock of the former PFIC includes t	he termination date, as
complete line 16, Part V.	230-5(u). Enter the excess distribution on line 156	s, rait v. ii the excess distribution is grea	ıter triari zero, also

Га	0004	/D	40 00441	
FULID	0021	IREV.	12-2014)	

Page 2

Pa	art III Income From a Qualified Electing Fund (QEF). All QEF st Election B, also complete lines 8a through 9c. (See instructions.)	areholders complet	e lines 6a through 7d	c. If you are	making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a		, 110 <u>1</u>	
b	Enter the portion of line 6a that is included in income under section 951 or that may be			Je I	
	excluded under section 1293(g)	. 6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income			6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	. 7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	. 7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amo	int in Part II of the S	Schedule D	8E (4	
	used for your income tax return. (See instructions.)	• • • • • • • • • • • • • • • • • • • •		7c	
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed	1 1	<u> </u>		··
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	. 8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	. 8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in bra	ckets)		8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includ	ble in income und	der section 951,		
	you may make Election B with respect to the amount on line 8e.			71/1/10	
9 a	Enter the total tax for the tax year (See instructions.)	9a			
b	Enter the total tax for the tax year determined without regard to the amount entered				
	on line 8e	9b			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is	extended by makin	g	サル しゅうしゅう	
	Election B			9c	
27.201.314	art IV Gain or (Loss) From Mark-to-Market Election (See in				
10a	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
b	Enter your adjusted basis in the stock at the end of the tax year			10b	
	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am	,	1		
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc				
	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during th		74		
a	Enter the fair market value of the stock on the date of sale or disposition			13a	
	Enter the adjusted basis of the stock on the date of sale or disposition			13b	
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as	•	·		
	tax return. If a loss, go to line 14			13c	
14a	Enter any unreversed inclusions (as defined in section 1296(d))	••••		14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In		- 1		
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a,			14b	
	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a				
	return according to the rules generally applicable for losses provided elsewhere in the Coc	e and regulations		14c	
	Note See instructions in case of multiple sales or dispositions	•			

orm 8621 (Rev. 12-2014) Part V Distributi	ons From and Di	spositions of S	tock of a Section	n 1291 Fund(S	ee instru	ctions	Page 3
	separate Part V for ea	•		,			,
5 a Enter your total distribution	s from the section 1291	fund during the currer	nt tax year with respect	to the applicable stock	. If the		
holding period of the stock	began in the current tax	year, see instructions			L	15a	
b Enter the total distributions							
included in income under s							
preceding the current tax y	ear (or if shorter, the por	tion of the shareholder	r's holding period befor	e the current tax year)		15b	
c Divide line 15b by 3. (See i	nstructions if the numbe	r of preceding tax year:	s is less than 3.)			15c	
d Multiply line 15c by 125%	(1.25)					15d	
e Subtract line 15d from line					stock.		
If there is an excess distrib	ution, complete line 16. l	f zero or less and you	did not dispose of stocl	during the tax year, d	lo not		
complete the rest of Part V	See instructions if you i	received more than one	e distribution during the	current tax year. Also	,		
see instructions for rules for	r reporting a nonexcess	distribution on your in	come tax return			15e	
f Enter gain or loss from the	disposition of stock of a	section 1291 fund or 1	former section 1291 fur	ıd. If a gain,			
complete line 16. If a loss,	show it in brackets and o	do not complete line 16	i			15f	
6 a If there is a positive amoun	•	• • • • • • • • • • • • • • • • • • • •		•	100		
Show your holding period	or each share of stock o	r block of shares held.	Allocate the excess dis	tribution or gain to eac	h day		
in your holding period. Add		-	•				
b Enter the total of the amou			•	•	4		
before the foreign corporat	ion became a PFIC (pre-	PFIC years). Enter thes	e amounts on your inco	ome tax	16		
						16b	
c Enter the aggregate increas	, ,		• •				
(other than the current tax). (See instructions.)	•••••			16c	
d Foreign tax credit. (See ins	/		B. 6.6*4* 6 a			16d	
e Subtract line 16d from line			•		<u> </u>	16e	
f Determine interest on each					İ	40.	
Enter the aggregate amount Part VI Status of	Prior Year Section					16f	
Selection of the select							~
Complete a s 1294 election	•	ach outstanding elec	atori. Complete illes	20 and 20 only if the	ere is a pai	uai term	ination of the section
1234 616000	/. (i)	(ii)	(iii)	(iv)	1 1	v)	(vi)
7 Tax year of outstanding		\"/	(/	(14)	,	<u>*). </u>	(*1)

		(i)	(ii)	(iii)	(iv)	(v)	(vi)
17	Tax year of outstanding election						
18	Undistributed earnings to which the election relates						
19	Deferred tax						
20	Interest accrued on deferred tax (line 19) as of the filing date						
21	Event terminating election						
22	Earnings distributed or deemed distributed during the tax year						
23	Deferred tax due with this return						
24	Accrued interest due with this return						
25	Deferred tax outstanding after partial termination of election					VIA Z. O. Do No	ness io resse possi
26	Interest accrued after partial termination of election						

Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund
Information about Form 8621 and its separate instructions is at www.irs.gov/form8621.

Internal Revenue Service	and its separate instructions is at www.irs.gov/form8621 · Sequence No. 05
Name of shareholder MAX M. & MARJORIE S. FISHER FOUR	Identifying number (see instructions)
INC.	38-1784340
Number, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other tax year beginning
TWO TOWNE SQUARE, NO. 920	, and ending , .
City or town, state, and ZIP code or country SOUTHFIELD, MI 48076	
Check type of shareholder filing the return: Individual X C	
Name of passive foreign investment company (PFIC) or qualified electin EAGLE POINT CREDIT GP I-A LTD	g fund (QEF) Employer identification number (if any)
Address (Enter number, street, city or town, and country.) 20 HORSENECK LANE	Reference ID number (see instructions) EAGLEPOINTCREDITGPIA
GREENWICH, CT 06830	Tax year of PFIC or QEF: calendar year 2014 or other tax year beginning , and ending , .
Part I Summary of Annual Information (See	
Provide the following information with respect to all shares of the PFIC h	neld by the shareholder:
Description of each class of shares held by the shareholder: Check if shares jointly owned with spouse.	
Chock it stidies joining owned with spease.	
2 Date shares acquired during the taxable year, if applicable:	
3 Number of shares held at the end of the taxable year:	
Part II Elections (See instructions.)	DEIO II III DEIO OFF O
B Election To Extend Time For Payment of Tax. I, a sharehol of the QEF until this election is terminated. Complete lines	PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III. Ider of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits as a through 9c of Part III to calculate the tax that may be deferred. Cludible under section 951, you maynot make this election. Also, see sections events that terminate this election.
C Election To Mark-to-Market PFIC Stock. I, a shareholder of 1296(e). Complete Part IV.	f a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section
	a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the
· · · · · · · · · · · · · · · · · · ·	y of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an rofits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the e line 16 of Part V.
distribution the gain recognized on the deemed sale of my in gain on line 15f of Part V.	shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess nterest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). <i>Enter</i>
1.1297-3(a), elect to make a deemed dividend election with	7(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) lations section 1.1297-3(d). Enter the excess distribution on line 15e, Part V. If the excess 6, Part V.
H Deemed Dividend Election With Respect to a Former PFIC elect to make a deemed dividend election with respect to the	C. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), e former PFIC. My holding period in the stock of the former PFIC includes the termination date, as ess distribution on line 15e, Part V. If the excess distribution is greater than zero, also

Pa	Income From a Qualified Electing Fund (QEF). All QEF sha Election B, also complete lines 8a through 9c. (See instructions.)	reholde	rs complete lines 6a through	7c. If yo	u are making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a		W. and	
	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income			6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a	1		
	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount		t II of the Schedule D		
	used for your income tax return. (See instructions.)			7c	
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b			8
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brac				
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includib	le in in	come under section 951,	STEEL!	
	you may make Election B with respect to the amount on line 8e.				
9 a	Enter the total tax for the tax year (See instructions.)	9a			
	Enter the total tax for the tax year determined without regard to the amount entered				
	on line 8e	9b			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is e		by making		
	Election B			9c	
474 1011	irt IV Gain or (Loss) From Mark-to-Market Election (See in				
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
b	Enter your adjusted basis in the stock at the end of the tax year			10b	
	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amo		•		
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu		-		
	loss on your tax return			12	
	lf you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-			
	Enter the fair market value of the stock on the date of sale or disposition			13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition			13b	
C	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as or	rdinary	ncome on your		
	tax return. If a loss, go to line 14		•••••	13c	
14a	Enter any unreversed inclusions (as defined in section 1296(d))			14a	
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Inc	lude thi	s amount as an ordinary		
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co	omplete	line 14c	14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a.	Include	this amount on your tax		
	return according to the rules generally applicable for losses provided elsewhere in the Code	and reg	julations	14c	
	Note. See instructions in case of multiple sales or dispositions.				

	ns From and Dis _{parate} Part V for eac			on 1291 Fund (See il ee instructions).	nstructions.)	
15 a Enter your total distributions					e	
holding period of the stock b						
b Enter the total distributions (r						
included in income under sec	ction 1291(a)(1)(B)) ma	de by the fund with re	espect to the applicable	stock for each of the 3 year	s	
preceding the current tax yea						
c Divide line 15b by 3. (See ins						
d Multiply line 15c by 125% (1.						
e Subtract line 15d from line 15	5a. This amount, if more	than zero, is the exc	ess distribution with re	spect to the applicable stock		
If there is an excess distributi	ion, complete line 16. If	zero or less and you	did not dispose of stoc	k during the tax year, do not		
complete the rest of Part V. S						
see instructions for rules for			-		15e	
f Enter gain or loss from the di	· -	· ·				
complete line 16. If a loss, sh					15f	
16 a If there is a positive amount of	on line 15e or 15f (or bo	th), attach a stateme			E E CA	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Show your holding period for		-		·		
in your holding period. Add a				,	2	
b Enter the total of the amounts			-	l tax years		
before the foreign corporation	n became a PFIC (pre-P	FIC years). Enter thes	se amounts on your inc	ome tax		
return as other income		- ,	•		16b	
c Enter the aggregate increases				***************************************		
(other than the current tax ye	ar and pre-PFIC years).	(See instructions.)			16c	
d Foreign tax credit. (See instru						
e Subtract line 16d from line 16	Sc. Enter this amount or	your income tax ret	urn as "additional tax." (See instructions.)	16e	
f Determine interest on each no						
Enter the aggregate amount of	of interest here. (See ins	tructions.)			16f	
Part Vi Status of P	rior Year Sectio	n 1294 Electio	ns and Termina	ation of Section 129	94 Elections	
Complete a sej	parate column for eac	ch outstanding elec	ction. Complete lines	s 25 and 26 only if there is	a partial termin	ation of the section
1294 election.						
	(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of outstanding						
election						
18 Undistributed earnings to						:
which the election relates						
19 Deferred tax						
20 Interest accrued on deferred						
tax (line 19) as of the filing date						
0			}			
21 Event terminating election						
22 Earnings distributed or deemed						
distributed during the tax year				N.		
23 Deferred tax due with this						
return						
24 Accrued interest due with						
this return						
25 Deferred tax outstanding after						
partial termination of election		<u></u>				
26 Interest accrued after partial						
termination of election			J			

Departr		rm 8621 and its separate instructions		Attachment Sequence No. 69
	e of shareholder	THE COLUMN TO SEPARATE THE SECOND	Identifying number (see instructions)	334333333
MAX	X M. & MARJORIE S. FISHER	FOUNDATION,	,	
INC			38-1784340	
	per, street, and room or suite no. (If a P.O. box, see instruc	ctions.)	Shareholder tax year: calendar year 2014 or other	er tax year beginning
	O TOWNE SQUARE, NO. 920		, and ending	<u> </u>
	or town, state, and ZIP code or country UTHFIELD, MI 48076			
		X Corporation Partnersh		Trust Estate
	e of passive foreign investment company (PFIC) or qualifie NOCEAN DIVERSIFIED CAT FU		Employer identification number (if any)	
	ess (Enter number, street, city or town, and country.) VICTORIA STREET	×	Reference ID number (see instructions) NODIVERSIFIEDCATFUNI)
	MILTON, BERMUDA HM 11		Tax year of PFIC or QEF: calendar year	2014 or other
	·		tax year beginning	, and
			ending ,	
	art I Summary of Annual Information			
	de the following information with respect to all shares of the			
1		Jer:		
	Check if shares jointly owned with spouse.			
2	Date shares acquired during the taxable year, if applicable	e:		
-	Date on a country and account year, it approach			
3	Number of shares held at the end of the taxable year:			
4	Value of shares held at the end of the taxable year (check	(the appropriate box, if applicable):		
		(c) \$100,001-150,000	(d) \$150,001-200,000	
	(e) If more than \$200,000, list value:			
	Type of PFIC and amount of any excess distribution or g	ain treated as an excess distribution u	nder section 1291, inclusion under section	
	1293, or inclusion or deduction under section 1296:			
	(a) Section 1291 \$ (b) Section 1293 (Qualified Electing Fund) \$			
	(b) Section 1293 (Qualified Electing Fund) \$(c) Section 1296 (Mark to Market) \$			
	(b) Souther 1250 (Mark to Market)			
Pai	art II Elections (See instructions.)			
A	Election To Treat the PFIC as a QEF. I, a sharehold	der of a PFIC, elect to treat the PFIC as	a QEF. Complete lines 6a through 7c of P	art III.
В	Election To Extend Time For Payment of Tax. I, a of the QEF until this election is terminated. Comple Note: If any portion of line 6a or line 7a of Part 1294(c) and 1294(f) and the related regulation	ete lines 8a through 9c of Part III t	n calculate the tay that may be deferred.	
c [Election To Mark-to-Market PFIC Stock. I, a share 1296(e). Complete Part IV.	holder of a PFIC, elect to mark-to-mar	ket the PFIC stock that is marketable within the	e meaning of section
D [Deemed Sale Election. I, a shareholder on the firs PFIC. Enter gain or loss on line 15f of Part V.	t day of a PFIC's first tax year as a QEF	² , elect to recognize gain on the deemed sale o	f my interest in the
E	Deemed Dividend Election. I, a shareholder on the amount equal to my share of the post-1986 earning excess distribution is greater than zero, also described the control of the post-1986.	gs and profits of the CFC as an excess		
F	Election To Recognize Gain on Deemed Sale of P distribution the gain recognized on the deemed sale gain on line 15f of Part V.	FIC. I, a shareholder of a former PFIC e of my interest in the PFIC on the last	or a PFIC to which section 1297(d) applies, ele day of its last tax year as a PFIC under section	ect to treat as an excess 1 1297(a). Enter
g [Deemed Dividend Election With Respect to a Sec 1.1297-3(a), elect to make a deemed dividend elect PFIC includes the CFC qualification date, as defined distribution is greater than zero, also complet	tion with respect to the Section 1297(i I in Regulations section 1.1297-3(d). <i>E</i>	e) PFIC. My holding period in the stock of the S	Section 1297(e)
H [Deemed Dividend Election With Respect to a Formelect to make a deemed dividend election with resp defined in Regulations section 1.1298-3(d). Enter complete line 16, Part V.	mer PFIC. I, a shareholder of a former ect to the former PFIC. My holding pe	riod in the stock of the former PFIC includes th	e termination date, as

Form	8621	(Rev	12-2014)	
UIIII	0021	incv.	12-2014)	

Part III Income From a Qualified Electing Fund (QEF). All QEF sh Election B, also complete lines 8a through 9c. (See instructions.)	areholders complete lines 6a through 7	c. If you are making	I
6 a Enter your pro rata share of the ordinary earnings of the QEF	6a	1000年	
b Enter the portion of line 6a that is included in income under section 951 or that may be		210	
excluded under section 1293(g)	. 6b	ANALOS	
c Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income		6c	
7 a Enter your pro rata share of the total net capital gain of the QEF	. 7a	-Falls	
b Enter the portion of line 7a that is included in income under section 951 or that may be		juli Va	
excluded under section 1293(g)	. 7b		
c Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amou	unt in Part II of the Schedule D		
used for your income tax return. (See instructions.)	•••••	7c	
8 a Add lines 6c and 7c		8a	
b Enter the total amount of cash and the fair market value of other property distributed		12 (E).	
or deemed distributed to you during the tax year of the QEF. (See instructions.)	. 8b	TEN IN	
c Enter the portion of line 8a not already included in line 8b that is attributable to shares			
in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	. 8 c		
d Add lines 8b and 8c		8d	
e Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in bra	ckets)	8e	
Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includi	ible in income under section 951,		
you may make Election B with respect to the amount on line 8e.			
9 a Enter the total tax for the tax year (See instructions.)	9a		
b Enter the total tax for the tax year determined without regard to the amount entered	· ·	1670	
on line 8e	9b		
c Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is			
Election B		9c	
Part IV Gain or (Loss) From Mark-to-Market Election (See in			
10a Enter the fair market value of your PFIC stock at the end of the tax year		10a	
		10b	
c Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am			
on your tax return. If a loss, go to line 11		10c	
11 Enter any unreversed inclusions (as defined in section 1296(d))		11	
12 Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc	-		
loss on your tax return		12	
13 If you sold or otherwise disposed of any section 1296 stock (see instructions) during th	•		
a Enter the fair market value of the stock on the date of sale or disposition		13a	
		13b	
c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as o			
tax return. If a loss, go to line 14		13c	
14a Enter any unreversed inclusions (as defined in section 1296(d))		14a	
b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In			
loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a,		14b	
c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a			
return according to the rules generally applicable for losses provided elsewhere in the Cod	e and regulations	14c	
Note. See instructions in case of multiple sales or dispositions.			

Part V	Distribution	ns From and Dis	positions of S	tock of a Section	n 1291 Fund (See ins	tructions	.)
		parate Part V for each					
					to the applicable stock. If the		
holding pe	riod of the stock be	egan in the current tax ye	ear, see instructions		•••••	15a	
		educed by the portions o					
included in	n income under sec	tion 1291(a)(1)(B)) mad	e by the fund with re	spect to the applicable	stock for each of the 3 years		
preceding	the current tax yea	r (or if shorter, the portic	on of the shareholder	's holding period before	e the current tax year)	15b	
						15c	
						15d	
e Subtract li	ne 15d from line 15	a. This amount, if more	than zero, is the exce	ess distribution with res	pect to the applicable stock.	13.5	
			•		during the tax year, do not		
		ee instructions if you rec					
				-		15e	
		sposition of stock of a se				100	
		ow it in brackets and do			- ,	15f	
		on line 15e or 15f (or bot		***************************************	aution and disposition		
		•	•		ribution or gain to each day		
		Il amounts that are alloca			indution of gain to each day		
=			•	•	ław wasan		
		s determined in line 16a t		-	-		
	Ab !	n became a PFIC (pre-PF	-	-		401	
					•••••	16b	
		s in tax (before credits) fo		• •		1	
						16c	
o Foreign tax	c credit. (See instru	ictions.)				16d	
					See instructions.)	16e	······································
		et increase in tax determi					
						16f	
Part VI					tion of Section 1294		=
		parate column for eac	h outstanding elec	tion. Complete lines	25 and 26 only if there is a	partial term	ination of the section
	1294 election.						
		(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of				l i			
18 Undistribute							
which the o	ed earnings to						
willen ute ei							
willen the el	ed earnings to						
19 Deferred tax	ed earnings to lection relates						
	ed earnings to lection relates						
19 Deferred tax 20 Interest accrue	ed earnings to lection relates						
19 Deferred tax 20 Interest accrue	ed earnings to ection relates C						
19 Deferred tax 20 Interest accrue	ed earnings to lection relates (
19 Deferred tax 20 Interest accruitax (line 19) as	ed earnings to lection relates (
19 Deferred tax 20 Interest accrue tax (line 19) as 21 Event termin 22 Earnings distr	ed earnings to lection relates (
19 Deferred tax 20 Interest accrue tax (line 19) as 21 Event termin 22 Earnings distr	ed earnings to lection relates (
19 Deferred tax 20 Interest accrue tax (line 19) as 21 Event termin 22 Earnings distr distributed du 23 Deferred tax	ed earnings to ection relates d on deferred of the filing date enaiting election eibuted or deemed ring the tax year of due with this						
19 Deferred tax 20 Interest accrue tax (line 19) as 21 Event termin 22 Earnings distr distributed du 23 Deferred tax	ed earnings to lection relates dection relates dection deferred sof the filing date nating election sibuted or deemed ring the tax year at due with this						
19 Deferred tax 20 Interest accruitax (line 19) as 21 Event termin 22 Earnings distributed du 23 Deferred tax return 24 Accrued interest	ed earnings to lection relates dection relates dection relates dection deferred of the filing date nating election sibuted or deemed ring the tax year of due with this erest due with						
19 Deferred tax 20 Interest accruitax (line 19) as 21 Event termin 22 Earnings distributed du 23 Deferred tax return 24 Accrued interest	ed earnings to ection relates dection relates do n deferred s of the filing date nating election sibuted or deemed ring the tax year due with this erest due with						
19 Deferred tax 20 Interest accrue tax (line 19) as 21 Event termin 22 Earnings distr distributed du 23 Deferred tax return 24 Accrued inter this return 25 Deferred tax of	ed earnings to lection relates dection relates do n deferred sof the filing date nating election libuted or deemed rring the tax year due with this learnest due with						
19 Deferred tax 20 Interest accrue tax (line 19) as 21 Event termin 22 Earnings distr distributed du 23 Deferred tax return 24 Accrued interest this return 25 Deferred tax of partial termina	ed earnings to ection relates dection relates do n deferred s of the filing date nating election sibuted or deemed ring the tax year due with this erest due with						

Form **8621**(Rev. December 2014)

Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

OMB No. 1545-1002

Attachment Department of the Treasury Information about Form 8621 and its separate instructions is at www.irs.gov/form8621 Sequence No. 69 Internal Revenue Service Name of shareholder Identifying number (see instructions) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Number, street, and room or suite no. (If a P.O. box, see instructions.) Shareholder tax year: calendar year 2014 or other tax year beginning TWO TOWNE SQUARE, NO. 920 and ending City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 Check type of shareholder filing the return: Individual X Corporation Partnership S Corporation Nongrantor Trust Estate Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) Employer identification number (if any) NEW OCEAN FOCUS CAT FUND, LTD Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) 22 VICTORIA STREET NOFOCUSCATFUND HAMILTON, BERMUDA HM 11 2014 or other Tax year of PFIC or QEF; calendar year tax year beginning and ending Summary of Annual Information (See instructions.) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Check if shares jointly owned with spouse. Date shares acquired during the taxable year, if applicable: Number of shares held at the end of the taxable year: Value of shares held at the end of the taxable year (check the appropriate box, if applicable); (b) \$50.001-100.000 (c) \$100.001-150.000 ___ \$150,001-200,000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296: Section 1293 (Qualified Electing Fund) \$ Section 1296 (Mark to Market) \$ Part II **Elections** (See instructions.) 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. 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. ____ | 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. 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 15f of Part V. 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. 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 15f of Part V. 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. 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.

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F∩rm	8621	(Rev	12-2014)	

Pi	art III Income From a Qualified Electing Fund (QEF). All QEF st Election B, also complete lines 8a through 9c. (See instructions.)	areholder	s complete lines 6a through 7	c. If you	u are making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	. 6a		7	
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income			6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	. 7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	. . 7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amo	unt in Part	II of the Schedule D		
	used for your income tax return. (See instructions.)			7c	
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed			Weetly.	
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	. 8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	. 8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in bra	ickets)		8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is include	ible in inc	ome under section 951,	12.0(0.5.0)	
	you may make Election B with respect to the amount on line 8e.				
9 a	Enter the total tax for the tax year (See instructions.)	. 9a			
b	Enter the total tax for the tax year determined without regard to the amount entered				
	on line 8e				
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is	extended	by making	ingv.	
	Election B			9c	
and the sales	art IV Gain or (Loss) From Mark-to-Market Election (See in				
10a	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
b	Enter your adjusted basis in the stock at the end of the tax year			10b	
	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am		•		
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc				
	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the				
a	Enter the fair market value of the stock on the date of sale or disposition			13a	
	Enter the adjusted basis of the stock on the date of sale or disposition			13b	
C	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as	•	•		
	tax return. If a loss, go to line 14			13c	
14a	Enter any unreversed inclusions (as defined in section 1296(d))			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In		•		
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a,			14b	
	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a		•		
	return according to the rules generally applicable for losses provided elsewhere in the Coc	le and regi	ulations	14c	
	Note See instructions in case of multiple sales or dispositions				

P				•		on 1291 Fund (Se	e instruc	tions.)	
			parate Part V for each						
15 a						t to the applicable stock.			
	holding period	of the stock t	pegan in the current tax y	ear, see instruction/	s		15	a	
b			reduced by the portions						
						e stock for each of the 3			
						ore the current tax year)		b	
C	Divide line 15b	by 3. (See in:	structions if the number	of preceding tax yea	ars is less than 3.)	•••••	15	C	
d	Multiply line 15	ic by 125% (1.25)			***************************************	15	d	
е	Subtract line 15	5d from line 1	5a. This amount, if more	e than zero, is the ex	cess distribution with re	espect to the applicable s	tock.		
	If there is an ex	cess distribu	tion, complete line 16. If	zero or less and yo	u did not dispose of sto	ck during the tax year, d o	not		
	complete the re	est of Part V.	See instructions if you re	eceived more than o	ne distribution during th	ne current tax year. Also,			
	see instruction	s for rules for	reporting a nonexcess	distribution on your	income tax return		15	е	
f	Enter gain or lo	ss from the c	lisposition of stock of a	section 1291 fund o	r former section 1291 fu	ınd. If a gain,			
	complete line 1	6. If a loss, s	how it in brackets and d	o not complete line	16		15	f	
16 a	If there is a pos	sitive amount	on line 15e or 15f (or bo	oth), attach a statem	ent for each excess dist	ribution and disposition.			
	Show your hole	ding period fo	r each share of stock or	block of shares held	d. Allocate the excess di	stribution or gain to each	day		
	in your holding	period. Add	all amounts that are allo	cated to days in eacl	n tax year.		4 3 3 3		
b	Enter the total of	of the amount	ts determined in line 16a	that are allocable to	the current tax year an	d tax years	- 1		
	before the forei	ign corporatio	on became a PFIC (pre-P	FIC years). Enter the	ese amounts on your inc	come tax	11/10		
	return as other	income					16	Ь	
C			s in tax (before credits)						
								С	
ď	Foreign tax cre	dit. (See instr	uctions.)				16	d	
е	Subtract line 16	3d from line 1	6c. Enter this amount or	n your income tax re	turn as "additional tax."	(See instructions.)	16	е	
f			iet increase in tax detern		-				

P	art VI S	tatus of F	Prior Year Section	n 1294 Electi	ons and Termin	ation of Section	1294 Ele	ctions	1
	Co	omplete a se	eparate column for ea	ch outstanding ele	ection. Complete line	s 25 and 26 only if the	re is a partia	al termir	nation of the section
	12	94 election.			T	,			
			(i)	(ii)	(iii)	(iv)	(v)		(vi)
	Tax year of outs								
	election								
	Jndistributed ea	-							
'	which the election	on relates							
	nterest accrued on								
t	ax (line 19) as of th	e filing date							
	Event terminatin								
	Earnings distribute								
	distributed during t	-							
	Deferred tax due eturn					-			
	Accrued interest								
	his return								
	Deferred tax outsta								
ŧ	partial termination of	of election							
26 I	nterest accrued	after partial							
1	ermination of el	ection							

Rev. December 2014) Information Return by a Shareholder of a Passive Foreign OMB No. 1545-1002 Investment Company or Qualified Electing Fund

Depa Inter	artment o	if the Treasury nue Service Information about Form 8621 and its separate instructions	is at which the mountained and	Attachment Sequence No. 69
		areholder	Identifying number (see instructions)	
		. & MARJORIE S. FISHER FOUNDATION,		
	C.		38-1784340	
		reet, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or oth	er tax year beginning
		OWNE SQUARE, NO. 920	, and ending	
		n, state, and ZIP code or country FIELD, MI 48076		
		of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor	Trust Estate
		ssive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number (if any)	
CA	PIO	EXPLORATION LTD.		
Add	ress (E	nter number, street, city or town, and country.)	Reference ID number (see instructions)	
		717-7 AVENUE SW	CAPIOEXPLORATION	
CA	LGA	RY, CANADA AB T2P 0Z3	Tax year of PFIC or QEF: calendar year	2014 or other
			tax year beginning	, and
_			ending ,	•
	art I	Summary of Annual Information (See instructions.)		
		following information with respect to all shares of the PFIC held by the shareholder:		
1	Desc	ription of each class of shares held by the shareholder: Check if shares jointly owned with spouse.		
		d Check it stiates jointly owned with spouse.		
2	Date	shares acquired during the taxable year, if applicable:		
_	Date	onal ob adquit of during the abuse your, if approache.		
3	Num	ber of shares held at the end of the taxable year:		
4	Value	e of shares held at the end of the taxable year (check the appropriate box, if applicable):		
•		\$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000	
		If more than \$200,000, list value:	(4) \$100,001 200,000	
	(-)			
5	Туре	of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	der section 1291, inclusion under section	*
	1293	8, <u>or i</u> nclusion or deduction under section 1296:		
	(a)	Section 1291 \$		
	(b)	Section 1293 (Qualified Electing Fund) \$		
	(c)	Section 1296 (Mark to Market) \$		
S D	art II	Elections (See instructions.)		
A	artii	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	a OFF Complete lines 6a through 7c of F	Part III
В	Ħ	Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the		
		of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, 1294(c) and 1294(f) and the related regulations for events that terminate this election 951.	calculate the tax that may be deferred.	• •
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	et the PFIC stock that is marketable within the	e meaning of section
D		Deemed Sale Election . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale o	f my interest in the
E		Deemed Dividend Election . I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess		
		excess distribution is greater than zero, also complete line 16 of Part V.	distribution. Error trib arroam on the roc	. Or rait v. ii the
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) annlies el	ect to treat as an excess
•		distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	day of its last tax year as a PFIC under section	1 1297(a). Enter
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.) PFIC. My holding period in the stock of the	Section 1297(e)
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	iod in the stock of the former PFIC includes the	ne termination date, as

Forn	n 8621 (Rev. 12-2014)			Page
	art III Income From a Qualified Electing Fund (QEF). All QEF sha Election B, also complete lines 8a through 9c. (See instructions.)	reholders comple	te lines 6a through 7c. If	you are making
6 8	Enter your pro rata share of the ordinary earnings of the QEF	6a	6000	
t	Enter the portion of line 6a that is included in income under section 951 or that may be	-		
	excluded under section 1293(g)	6b	and the second	
(Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income		6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a	Min Fr	
t	Enter the portion of line 7a that is included in income under section 951 or that may be	\ <u></u>		II.
	excluded under section 1293(g)	7b		L.
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun	nt in Part II of the	Schedule D	
	used for your income tax return. (See instructions.)			
8 a	Add lines 6c and 7c			
b	Enter the total amount of cash and the fair market value of other property distributed		おま	£.
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b		15
6	Enter the portion of line 8a not already included in line 8b that is attributable to shares		541	
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c		
Ó	Add lines 8b and 8c		8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brac	8e		
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includib			
	you may make Election B with respect to the amount on line 8e.			
9 a	Enter the total tax for the tax year (See instructions.)	9a		
	Enter the total tax for the tax year determined without regard to the amount entered		3.74	
	on line 8e	9b		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is e		ng	
	Election B	9c		
P	art IV Gain or (Loss) From Mark-to-Market Election (See in	structions.)		
10a	Enter the fair market value of your PFIC stock at the end of the tax year		10a	1
	Enter your adjusted basis in the stock at the end of the tax year			
	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amo			
	on your tax return. If a loss, go to line 11	-	100	;
11	Enter any unreversed inclusions (as defined in section 1296(d))	***************************************	11	
	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			
	loss on your tax return		, I	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	tax year:		
а	Enter the fair market value of the stock on the date of sale or disposition	***************************************	138	ı

b Enter the adjusted basis of the stock on the date of sale or disposition

tax return. If a loss, go to line 14

14a Enter any unreversed inclusions (as defined in section 1296(d))

b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c

c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount on your tax

c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your

return according to the rules generally applicable for losses provided elsewhere in the Code and regulations

Note. See instructions in case of multiple sales or dispositions.

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13b

13c

14a

14b

14c

		-	on and disposition (s	ee instructions).	instructions.)	
15 a Enter your total distributions					the	
holding period of the stock b		=	-		1 I	
b Enter the total distributions (***********	butions but not		
included in income under sec	ction 1291(a)(1)(B)) n	nade by the fund with re	espect to the applicable	stock for each of the 3 ye	ars	
preceding the current tax yea	ır (or if shorter, the po	rtion of the shareholde	r's holding period befor	re the current tax year)	15b	
c Divide line 15b by 3. (See ins						
d Multiply line 15c by 125% (1						
e Subtract line 15d from line 1	5a. This amount, if mo	ore than zero, is the exc	ess distribution with re	spect to the applicable sto	ck.	
If there is an excess distribut						
complete the rest of Part V. S						
see instructions for rules for	reporting a nonexcess	s distribution on your in	come tax return		15e	
f Enter gain or loss from the di	isposition of stock of a	a section 1291 fund or t				
complete line 16. If a loss, sh	ow it in brackets and	do not complete line 16	3		15f	
16 a If there is a positive amount of	on line 15e or 15f (or l	both), attach a statemer				
Show your holding period for					tay	
in your holding period. Add a	II amounts that are all	ocated to days in each	tax year.			
b Enter the total of the amounts	s determined in line 16	Sa that are allocable to t	the current tax year and	tax years		
before the foreign corporation	n became a PFIC (pre-	-PFIC years). Enter thes	se amounts on your inc	ome tax		
return as other income					16b	
c Enter the aggregate increases						
(other than the current tax ye	ar and pre-PFIC years). (See instructions.)			16c	
d Foreign tax credit. (See instru	ıctions.)				16d	
e Subtract line 16d from line 16	6c. Enter this amount	on your income tax retu	urn as "additional tax." (See instructions.)	16e	
f Determine interest on each no						
Enter the aggregate amount of	of interest here. (See i	nstructions.)	***************************************		16f	
Part VI Status of P	rior Year Secti	on 1294 Electio	ns and Termina	ation of Section 1	294 Elections	
Complete a se	parate column for e	ach outstanding elec	ction. Complete lines	25 and 26 only if there	e is a partial termina	tion of the section
1294 election.						
	(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of outstanding						
election						
18 Undistributed earnings to						
which the election relates						
19 Deferred tax						
20 Interest accrued on deferred						
tax (line 19) as of the filing date						
21 Event terminating election						
22 Earnings distributed or deemed						
distributed during the tax year						
23 Deferred tax due with this						
return						
24 Accrued interest due with						
this return						
25 Deferred tax outstanding after						
partial termination of election						
26 Interest accrued after partial						
termination of election			1	1		

Intern	al Reve	nue Service	▶ Information a	bout Form 8621 and its separa	te instructions	is at www.irs.gov/form8621	Sequence No. 69		
Name	e of sh	areholder				Identifying number (see instructions)			
MA.	X M	. & MARJO	ORIE S. FIS	HER FOUNDATION	Γ,				
INC. 38-1784340									
	Shareholder tax year: calendar year 2014 or other tax year beginning								
TW	TWO TOWNE SQUARE, NO. 920								
		n, state, and ZIP coe FIELD, M							
Chec	k type	of shareholder filin	g the return: In	dividual X Corporation	Partnershi	p S Corporation Nongrantor	Trust Estate		
Name	e of pa	ssive foreign invest	ment company (PFIC) o	r qualified electing fund (QEF)		Employer identification number (if any)			
NO	CM	RE 2014-1	L LTD		i				
			, city or town, and count			Reference ID number (see instructions)			
			22 VICTORI	A ST		NOCMRE20141			
HAI	MIL	TON, BERN	MUDA HM 11			Tax year of PFIC or QEF: calendar year	2014 or other		
						tax year beginning	, and		
_						ending ,	•		
	art I			mation (See instruction					
_		-	·	ares of the PFIC held by the sha	reholder:				
1	Desc	¬ '	s of shares held by the s						
	<u>L</u>	J Check if shares jo	ointly owned with spous	8.					
2	Date	shares acquired du	uring the taxable year, if a	applicable:			<u></u>		
3	Num	ber of shares held a	at the end of the taxable	year:					
4				ar (check the appropriate box, if		🗆 •			
	٠.	\$0-50,000	(b) \$50,001-	• • • • • • • • • • • • • • • • • • • •	01-150,000	(d) \$150,001-200,000			
	(e)	if more than \$200,0	000, list value:						
	T	of DEIO and amoun		Na		4004 (111)			
5					s distribution ur	nder section 1291, inclusion under section			
		Section 129	duction under section 12	290.					
	(a) (b)		ι φ 3 (Qualified Electing Fund	- 					
	(c)		6 (Mark to Market) \$	υ) φ					
	(0)	360000 1230	(Wark to Warker)						
Ps	art II	Flections	(See instructions	1					
$\overrightarrow{\Delta}$					eat the PEIC as	a QEF. Complete lines 6a through 7c of I	Part III		
В	一					the time for payment of tax on the undistribute			
		Note: If any portion	is election is terminated. <i>on of line 6a or line 7a</i>	Complete lines 8a through 9	oc of Part III to r section 951.	o calculate the tax that may be deferred. . you may _{not} make this election. Also, s			
С			to-Market PFIC Stock. I	_		eet the PFIC stock that is marketable within th	e meaning of section		
D		Deemed Sale Elec			x year as a QEF	, elect to recognize gain on the deemed sale o	of my interest in the		
E		Deemed Dividend	l Election. I, a sharehold	er on the first day of a PFIC's fir		QEF that is a controlled foreign corporation (
				6 earnings and profits of the CFC o, also complete line 16 of P		distribution. Enter this amount on line 156	of Part V. If the		
F		distribution the gain on line 15f	in recognized on the dee of Part V.	med sale of my interest in the P	FIC on the last	or a PFIC to which section 1297(d) applies, e day of its last tax year as a PFIC under sectio	n 1297(a). <i>Enter</i>		
G		1.1297-3(a), elect PFIC includes the	to make a deemed divide CFC qualification date, as	end election with respect to the	Section 1297(e	a section 1297(e) PFIC, within the meaning o) PFIC. My holding period in the stock of the inter the excess distribution on line 15e,	Section 1297(e)		
Н		Deemed Dividend elect to make a de	l Election With Respect emed dividend election v ions section 1.1298-3(d)	to a Former PFIC. I, a sharehole with respect to the former PFIC.	My holding per	PFIC, within the meaning of Regulations sect iod in the stock of the former PFIC includes the part V. If the excess distribution is great to the property of the excess distribution is great to the property of the excess distribution is great to the property of the excess distribution is great to the property of the p	he termination date, as		

.....

13 If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:

a Enter the fair market value of the stock on the date of sale or disposition

b Enter the adjusted basis of the stock on the date of sale or disposition

14a Enter any unreversed inclusions (as defined in section 1296(d))

b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c

c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount on your tax

c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your

return according to the rules generally applicable for losses provided elsewhere in the Code and regulations

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13a

13b

13c

14a

14b

14c

tax return. If a loss, go to line 14

Note. See instructions in case of multiple sales or dispositions.

Part V	Distribution	s From and Dis	positions of S	tock of a Sectio	n 1291 Fund (See ins	tructions	.)
	Complete a _{sep}	arate Part V for each	h excess distribution	on and disposition (se	e instructions).		
					o the applicable stock. If the		
holding perio	od of the stock be	gan in the current tax y	ear, see instructions			15a	
				that were excess distrib			
included in ir	ncome under sect	ion 1291(a)(1)(B)) mad	de by the fund with re	espect to the applicable s	stock for each of the 3 years		
preceding th	e current tax year	(or if shorter, the portion	on of the shareholde	r's holding period before	the current tax year)	15b	
					***************************************	15c	
	15c by 125% (1.2					15d	
e Subtract line	15d from line 15a				pect to the applicable stock.		
If there is an	excess distributio	n, complete line 16. If a	zero or less and you	did not dispose of stock	during the tax year, do not		
				e distribution during the			
						15e	
				former section 1291 fun			
		w it in brackets and do				15f	
			· ·	nt for each excess distrib		#337 E.A	
		•	•		ribution or gain to each day		
		amounts that are allocated					
				the current tax year and	tax vears		
				se amounts on your inco	•		
return as oth			•	•		16b	
		in tax (before credits) f			***************************************	100	
						16c	
						16d	
e Subtract line	16d from line 16d	. Enter this amount on	vour income tax retu	urn as "additional tax." (S	ee instructions.)	16e	
				ig the rates and methods		100	
						16f	
					tion of Section 1294	Election	S
51 - 12 - 12 - 12 - 12 - 12 - 12 - 12 -	Complete a sep	arate column for eac	h outstanding elec	ction. Complete lines	25 and 26 only if there is a	partial term	ination of the section
	1294 election.						
		(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of ou	tstanding						
election							
18 Undistributed							
which the elec	tion relates			1			
	Γ						
19 Deferred tax							
20 Interest accrued							
tax (line 19) as of	I.						
21 Event terminat	ting election						
22 Earnings distribu	ited or deemed						
distributed durin	g the tax year						
23 Deferred tax d	ue with this	8					
return					21		
24 Accrued intere							
this return							
25 Deferred tax outs							
partial terminatio							THE PERSON NAMED IN COLUMN TO SERVICE OF THE PERSON NAMED IN COLUMN TO SERVICE
26 Interest accrue							
termination of							

Attachment

OMB No. 1545-1002

Department of the Treasury Internal Revenue Service Information about Form 8621 and its separate instructions is at www.irs.gov/form8621 Sequence No. 69 Name of shareholder Identifying number (see instructions) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Number, street, and room or suite no. (If a P.O. box, see instructions.) Shareholder tax year: calendar year 2014 or other tax year beginning TWO TOWNE SQUARE, NO. 920 and ending City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 Check type of shareholder filing the return: Individual X Corporation □ Partnership S Corporation Nongrantor Trust Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) Employer identification number (if any) EAGLE POINT CREDIT PARTNERS SUB III LTD Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) 89 NEXUS WAY, 2ND FLOOR, CAMANA BAY **EAGLEPOINTCREDITPTRSUBIII** GRAND CAYMAN, CAYMAN ISLANDS KY1-1205 2014 or other Tax year of PFIC or QEF; calendar year tax year beginning and ending Summary of Annual Information (See instructions.) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Check if shares jointly owned with spouse. Date shares acquired during the taxable year, if applicable: Number of shares held at the end of the taxable year: Value of shares held at the end of the taxable year (check the appropriate box, if applicable): (a) \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000 (d) \$150,001-200,000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296: (b) Section 1293 (Qualified Electing Fund) \$ Section 1296 (Mark to Market) \$ (c) L Part II **Elections** (See instructions.) A 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. 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 make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election. 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. 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 15f of Part V. 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. 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 15f of Part V. 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. 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), н 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.

Form 8621/F	lev. 12-2014)	

P	Election B, also complete lines 8a through 9c. (See instructions.)	areholde	rs complete lines 6a through 7	/c. If yo	u are making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a		y, A	
	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	. 6b		A162	
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income		***************************************	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	. 7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be		.		
	excluded under section 1293(g)	. 7b		1000	
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount	ınt in Par	t II of the Schedule D		
	used for your income tax return. (See instructions.)			7c	
8 a	Add lines 6c and 7c		·····	8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	. 8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	. 8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in bra	8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is include	ible in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.				
9 a	Enter the total tax for the tax year (See instructions.)	. 9a			
b	Enter the total tax for the tax year determined without regard to the amount entered				
	on line 8e				
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is	extende	d by making		
	Election B			9c	
Carry Marie	art IV Gain or (Loss) From Mark-to-Market Election (See in		/		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
	Enter your adjusted basis in the stock at the end of the tax year			10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am				
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc		•		
	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	_		10	
	Enter the fair market value of the stock on the date of sale or disposition		13a		
	Enter the adjusted basis of the stock on the date of sale or disposition			13b	
C	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as	•	•		
	tax return. If a loss, go to line 14			13c	
	Enter any unreversed inclusions (as defined in section 1296(d))			14a	
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In				
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a,			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a		-		
	return according to the rules generally applicable for losses provided elsewhere in the Cod	e and req	gulations	14c	
	Mate. Can instructions in case of multiple sales or dispositions				

		ispositions of Sach excess distribution		on 1291 Fund(See	instructions.)	
15 a Enter your total distributions f					the	
holding period of the stock be						
b Enter the total distributions (re	educed by the portion	s of such distributions	that were excess distri	butions but not		
included in income under sect						
preceding the current tax year						
c Divide line 15b by 3. (See inst	ructions if the numbe	r of preceding tax years	s is less than 3.)	•••••	15c	
d Multiply line 15c by 125% (1.3	25)	***************************************			15d	
e Subtract line 15d from line 15	a. This amount, if mo	re than zero, is the exce	ess distribution with re	spect to the applicable sto	ck.	
If there is an excess distribution					ot	
complete the rest of Part V. Se			_	e current tax year. Also,		
see instructions for rules for r		-	*****		15e	
f Enter gain or loss from the dis				nd. If a gain,		
complete line 16. If a loss, sho			***************************************		15f	
16 a If there is a positive amount o	•	•		•		
Show your holding period for				tribution or gain to each d	ay	
in your holding period. Add all			-			
b Enter the total of the amounts			•	•		
before the foreign corporation	•-				404	
return as other income c Enter the aggregate increases				•••••	16Ь	
(other than the current tax yea			7 '		16c	
d Foreign tax credit. (See instruc	ntione)). (Occ moductions.)	•••••		16d	
e Subtract line 16d from line 16	c. Enter this amount of	on vour income tax retu	trn as "additional tax " (See instructions)	16e	
f Determine interest on each ne						
Enter the aggregate amount of			-		16f	
				ation of Section 1		
				25 and 26 only if there		tion of the section
1294 election.						
	(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of outstanding					·	
election						
18 Undistributed earnings to						
which the election relates						
19 Deferred tax						
20 Interest accrued on deferred						
tax (line 19) as of the filing date						
01 Funt terminating election						
21 Event terminating election						
22 Earnings distributed or deemed						
distributed during the tax year 23 Deferred tax due with this			<u> </u>			
			!			
return						
this return						
25 Deferred tax outstanding after				Sarola Della della della	s god man i Swa	
partial termination of election			III SANTON AND AND AND AND AND AND AND AND AND AN			
26 Interest accrued after partial						
termination of election						

Attachment

Department of the Treasur ► Information about Form 8621 and its separate instructions is at www.irs.gov/form8621 Sequence No. 69 Name of shareholder Identifying number (see instructions) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Number, street, and room or suite no. (If a P.O. box, see instructions.) Shareholder tax year: calendar year 2014 or other tax year beginning TWO TOWNE SOUARE, NO. 920 and ending City or town, state, and ZIP code or country 48076 SOUTHFIELD, MI Individual X Corporation Partnership Check type of shareholder filing the return: S Corporation Nongrantor Trust Estate Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) Employer identification number (if any) OCTAGON INVESTMENTS PARTNERS XX LTD Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) P.O. BOX 1093, BOUNDARY HALL, CRICKET SQUARE OCTAGONINVESTPARTNERSXX GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 2014 or other Tax year of PFIC or QEF; calendar year tax year beginning and ending Part I Summary of Annual Information (See instructions.) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Check if shares jointly owned with spouse. Date shares acquired during the taxable year, if applicable: Number of shares held at the end of the taxable year: Value of shares held at the end of the taxable year (check the appropriate box, if applicable): (a) \$0-50.000 (b) \$50,001-100,000 (c) \$100,001-150,000 (d) \$150,001-200,000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296: (b) Section 1293 (Qualified Electing Fund) \$ Section 1296 (Mark to Market) \$ (c) L Part II Elections (See instructions.) 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. 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. Election To Mark-to-Market PFIC Stock. 1, 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. 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 15f of Part V. 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. 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 15f of Part V. 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. 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.

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Form	8621	(Rev.	12-2014)	

P	art III Income From a Qualified Electing Fund (QEF). All QEF sh Election B, also complete lines 8a through 9c. (See instructions.)	areholders complete lines 6a th	rough 7c. If you are making	
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a	#U.V	
	Enter the portion of line 6a that is included in income under section 951 or that may be		in En	
	excluded under section 1293(g)	6b	0.00	
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income		6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	. 7a		
b	Enter the portion of line 7a that is included in income under section 951 or that may be			
	excluded under section 1293(g)	. 7b	息/編	
C			1/4	
	used for your income tax return. (See instructions.)		7c	
8 a	Add lines 6c and 7c			
b	Enter the total amount of cash and the fair market value of other property distributed		135.9	
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	. 8b		
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares			
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	. 8c		
d			8d	
е		8e		
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is include	ible in income under section	951,	
	you may make Election B with respect to the amount on line 8e.	1 1	9,007	
	Enter the total tax for the tax year (See instructions.)	. 9a		
b	Enter the total tax for the tax year determined without regard to the amount entered			
	on line 8e			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is	extended by making		
	Election B		9c	
11 12 2 5	art IV Gain or (Loss) From Mark-to-Market Election (See in		Lasti	
10a	Enter the fair market value of your PFIC stock at the end of the tax year		10a	
	Enter your adjusted basis in the stock at the end of the tax year		10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am	•	400	
44	on your tax return. If a loss, go to line 11		10c	
	Enter any unreversed inclusions (as defined in section 1296(d)) Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc			- 18
12	loss on your tax return	-	1)	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during th			
	Enter the fair market value of the stock on the date of sale or disposition		13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition	•••••	13b	
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as			
·	tax return. If a loss, go to line 14		13c	
14a	Enter any unreversed inclusions (as defined in section 1296(d))			
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In			
.,	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a,		* I I	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a			
	return according to the rules generally applicable for losses provided elsewhere in the Cod			
	Note See instructions in case of multiple sales or dispositions			

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)(8)) 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. (See instructions if the number of preceding tax years is less than 3.) 15c d Multiply line 15c 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 f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and do not complete line 16 f Enter gain or loss from the disposition of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. b Enter the total of the amounts determined in line 16a that are allocated to tay in each tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other tha
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. (See instructions if the number of preceding tax years is less than 3.) d Multiply line 15b 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 f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and do not complete line 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period and all amounts that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). (See instructions.) 16c d Foreign tax credit. (See instructions.) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) 16d e Subtract line 16d from line 16c. Enter this
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1294 election
(i) (ii) (iii) (iv) (v) (vi)
17 Tax year of outstanding election
18 Undistributed earnings to
which the election relates
WINCH the election relates
19 Deferred tax
20 Interest accrued on deferred
tax (line 19) as of the filing date
tes (into 16) do or the ining date
21 Event terminating election
22 Earnings distributed or deemed
distributed during the tax year
23 Deferred tax due with this
return
24 Accrued interest due with
this return
25 Deferred tax outstanding after
partial termination of election
26 Interest accrued after partial
termination of election

Attachment

OMB No. 1545-1002

► Information about Form 8621 and its separate instructions is at www.irs.gov/form8621 Internal Revenue Service Sequence No. 69 Identifying number (see instructions) Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Number, street, and room or suite no. (If a P.O. box, see instructions.) Shareholder tax year; calendar year 2014 or other tax year beginning TWO TOWNE SQUARE, NO. 920 and ending City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 Check type of shareholder filing the return: Individual X Corporation □ Partnership S Corporation Nongrantor Trust Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) Employer identification number (if any) APIDOS CLO XIX INCOME NOTE LTD Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) CLIFTON HOUSE, 75 FORT ST, P.O. BOX 1350 **APIDOSCLOXIXINCOME** 2014 or other GRAND CAYMAN, CAYMAN ISLANDS KY1-1108 Tax year of PFIC or QEF: calendar year tax year beginning and ending Summary of Annual Information (See instructions.) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Check if shares jointly owned with spouse. Date shares acquired during the taxable year, if applicable: Number of shares held at the end of the taxable year: Value of shares held at the end of the taxable year (check the appropriate box, if applicable): \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000 ___ \$150,001-200,000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296: Section 1291 \$ Section 1293 (Qualified Electing Fund) \$ (b) (c) L Part II **Elections** (See instructions.) 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. 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. 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. 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 15f of Part V. 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. 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 15f of Part V. 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. 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), н 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.

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	art III Income From a Qualified Electing Fund (QEF). All QEF sha	areholders complete lines 6a thro	ugh 7c. If you are making	
	Election B, also complete lines 8a through 9c. (See instructions.)			······································
	Enter your pro rata share of the ordinary earnings of the QEF	6a		
D	Enter the portion of line 6a that is included in income under section 951 or that may be	1 1	V = 7 V	
	excluded under section 1293(g)	6b		
C			6с	
	Enter your pro rata share of the total net capital gain of the QEF	7a		
b	Enter the portion of line 7a that is included in income under section 951 or that may be	t t	0.11(44)	
	excluded under section 1293(g)	7b		
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amou	nt in Part II of the Schedule D	S 7 7	
	used for your income tax return. (See instructions.)		7c	
8 a	Add lines 6c and 7c		8a	
b	Enter the total amount of cash and the fair market value of other property distributed		秋 園	
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b		
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares		S Nov	
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c	0.00	
d			8d	
е		ckets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includit			
	you may make Election B with respect to the amount on line 8e.		,	
9 a	Enter the total tax for the tax year (See instructions.)	9a		
	Enter the total tax for the tax year determined without regard to the amount entered			
-	on line 8e	9b		
c	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is a	7.7		
·	Election B	9c		
Pi	art IV Gain or (Loss) From Mark-to-Market Election (See in	structions.)	00	
10a	Enter the fair market value of your PFIC stock at the end of the tax year		10a	
	Enter your adjusted basis in the stock at the end of the tax year			
	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amo			
	on your tax return. If a loss, go to line 11	•	10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))	•••••	11	
	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Incl			
	loss on your tax return		12	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	tax year:		

.....

a Enter the fair market value of the stock on the date of sale or disposition

b Enter the adjusted basis of the stock on the date of sale or disposition

14a Enter any unreversed inclusions (as defined in section 1296(d))

b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c

c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount on your tax

c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your

return according to the rules generally applicable for losses provided elsewhere in the Code and regulations

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13a

13b

13c

14a

14b

14c

tax return. If a loss, go to line 14

Note. See instructions in case of multiple sales or dispositions.

Part V		ns From and Dis	-		`	e instru	ctions.)	
		parate Part V for each						
		from the section 1291 f						
		egan in the current tax y				<u> 1</u>	5a	
	,	reduced by the portions						
		ction 1291(a)(1)(B)) mad						
		ır (or if shorter, the porti					5b	
c Divide line	e 15b by 3. (See ins	tructions if the number (of preceding tax year	rs is less than 3.)		1	5c	
	ne 15c by 125% (1	• • • • • • • • • • • • • • • • • • • •					5d	
e Subtract l	ine 15d from line 1	5a. This amount, if more	than zero, is the exc	cess distribution with res	spect to the applicable s	tock.		
If there is	an excess distribut	ion, complete line 16. If	zero or less and you	did not dispose of stock	during the tax year, d	o not		
complete	the rest of Part V. S	See instructions if you re	ceived more than on	e distribution during the	current tax year. Also,			
see instru	ctions for rules for	reporting a nonexcess d	listribution on your i	ncome tax return		1	5e	
f Enter gair	or loss from the di	isposition of stock of a s	ection 1291 fund or	former section 1291 fur	nd. If a gain,			
-		low it in brackets and do	· ·	***************************************			5f	
16 a if there is	a positive amount of	on line 15e or 15f (or bo	th), attach a stateme	nt for each excess distri	bution and disposition.	lie		
Show you	ır holding period foı	r each share of stock or	block of shares held	. Allocate the excess dis	tribution or gain to eacl	n day	3 1	
in your ho	olding period. Add a	II amounts that are alloc	ated to days in each	tax year.				
b Enter the	total of the amounts	s determined in line 16a	that are allocable to	the current tax year and	tax years			
		n became a PFIC (pre-PI	FIC years). Enter the	se amounts on your inco	ome tax			
return as	other income			•••••		<u>1</u>	6b	
		s in tax (before credits) f					İ	
		ar and pre-PFIC years).					6c	
d Foreign ta	x credit. (See instru	uctions.)				1	6 d	
		6c. Enter this amount on				<u>1</u>	6e	
		et increase in tax determ		•				
		of interest here. (See ins					6f	
Part VI		rior Year Section						
		parate column for eac	ch outstanding ele	ction. Complete lines	25 and 26 only if the	ere is a part	ial termin	ation of the section
	1294 election.			T				
		(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of								
18 Undistribut								
which the	election relates							
40.54 1.								
	x							
20 Interest accre	1							
tax (line 19) a	is of the filing date							
04 5								
21 Event term	1							
	ributed or deemed							
	uring the tax year							
23 Deferred ta								
24 Accrued in	I							
25 Deferred tax				White Early Control	Was Single State		N. San	
	ation of election							
	crued after partial							
termination	of election			1				

Inter	artment o nal Reve	nue Service Information about Form 8621 and its separate instructions	is at www.irs.gov/form8621	Sequence No. 69				
MA	X M	areholder . & MARJORIE S. FISHER FOUNDATION,	Identifying number (see instructions)					
	C.	rest and room or quite no. (If a D.O. how one instructions.)	38-1784340 Shareholder tax year: calendar year 2014 or other					
		reet, and room or suite no. (If a P.O. box, see instructions.) OWNE SQUARE, NO. 920	Shareholder tax year: calendar year 4 U 1 4 or other	er tax year beginning				
City	or tow	n, state, and ZIP code or country FIELD, MI 48076	, and onling					
		of shareholder filing the return: Individual X Corporation Partnershi	ip S Corporation Nongrantor 1	rust Estate				
		ssive foreign investment company (PFIC) or qualified electing fund (QEF) ON INCOME NOTE XIV LTD	Employer identification number (if any)					
P.	Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL, CRICKET SQUARE OCTAGONINCOMENOTEXIV							
		CAYMAN, CAYMAN ISLANDS KY1-1102	Tax year of PFIC or QEF: calendar year tax year beginning , ending , .					
	art I	Summary of Annual Information (See instructions.)		·				
		following information with respect to all shares of the PFIC held by the shareholder: cription of each class of shares held by the shareholder: Check if shares jointly owned with spouse.						
2	Date	shares acquired during the taxable year, if applicable:						
3	Num	ber of shares held at the end of the taxable year:						
4	(a)	Value of shares held at the end of the taxable year (check the appropriate box, if applicable): (a) \$\sum \\$0-50,000 \(\textbf{b} \) \$\sum \\$50,001-100,000 \(\textbf{c} \) \$\square \\$100,001-150,000 \(\textbf{d} \) \$\square \\$150,001-200,000 \(\textbf{e} \) \$\square \\$150,001-200,						
5	Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296: (a) Section 1291 \$ (b) Section 1293 (Qualified Electing Fund) \$ (c) Section 1296 (Mark to Market) \$							
P	art II							
A B		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. 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.						
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	cet the PFIC stock that is marketable within the	meaning of section				
D		Deemed Sale Election . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. <i>Enter gain or loss on line 15f of Part V.</i>	, elect to recognize gain on the deemed sale of	f my interest in the				
E		Deemed Dividend Election . I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess 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 distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.						
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the S Enter the excess distribution on line 15e, I	Section 1297(e) Part V. If the excess				
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V	iod in the stock of the former PFIC includes th	e termination date, as				

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P	art III Income From a Qualified Electing Fund (QEF). All QEF s Election B, also complete lines 8a through 9c. (See instructions.)	hareholders	s complete lines 6a through 7	c. If yo	u are making		
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
	Enter the portion of line 6a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	6b		11 M			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income			6c	: 		
	Enter your pro rata share of the total net capital gain of the QEF			Val (iii			
	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b			l		
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount		II of the Schedule D		l		
	used for your income tax return. (See instructions.)			7c	l		
8 a	Add lines 6c and 7c			8a			
b				de mi			
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b			8		
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				1		
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c			l		
d	Add lines 8b and 8c			8d	L		
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in bi	rackets)		8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is include	dible in inc	ome under section 951,				
	you may make Election B with respect to the amount on line 8e.				l		
9 a	Enter the total tax for the tax year (See instructions.)	9a			l		
	Enter the total tax for the tax year determined without regard to the amount entered				l		
	on line 8e	9b			l		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which i	s extended	by making		l		
	Election B			9c			
Same to	art IV Gain or (Loss) From Mark-to-Market Election (See	instructi	ons.)				
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
	Enter your adjusted basis in the stock at the end of the tax year			10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this a						
	on your tax return. If a loss, go to line 11			10c			
11	11 Enter any unreversed inclusions (as defined in section 1296(d))						
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as an ordinary						
loss on your tax return 12							
	13 If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:						
	Enter the fair market value of the stock on the date of sale or disposition	13a 13b					
	Enter the adjusted basis of the stock on the date of sale or disposition						
C	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as						
	tax return. If a loss, go to line 14	13c					
	nter any unreversed inclusions (as defined in section 1296(d))						
b	Inter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary						
	ss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c			14b			
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount on your tax						
	return according to the rules generally applicable for losses provided elsewhere in the Co	de and regu	ulations	14c			
	Note See instructions in case of multiple sales or dispositions				8		

Part V		ns From and Dis				e instruction	ns.)
		aparate Part V for each					
		from the section 1291 fu					
		pegan in the current tax ye				15a	
		(reduced by the portions (
		ction 1291(a)(1)(B)) mad					
		ar (or if shorter, the portio					*
		structions if the number o	f preceding tax year	s is less than 3.)	•••••		
	line 15c by 125% (1	•					
		5a. This amount, if more					
		tion, complete line 16. If z				not	
		See instructions if you red		•	current tax year. Also,		
		reporting a nonexcess di				15e	
		lisposition of stock of a se			id. If a gain,		
complete	line 16. If a loss, s	how it in brackets and do	not complete line 16	3		15f	· · · · · · · · · · · · · · · · · · ·
16 a If there is	a positive amount	on line 15e or 15f (or bot	h), attach a statemei	nt for each excess distri	bution and disposition.		
Show yo	ur holding period fo	er each share of stock or t	lock of shares held.	Allocate the excess dis	tribution or gain to each	day	
		all amounts that are alloca		-			
b Enter the	total of the amount	ts determined in line 16a t	hat are allocable to t	the current tax year and	tax years		
before th	e foreign corporatio	on became a PFIC (pre-PF	IC years). Enter thes	se amounts on your inco	ome tax		
return as	other income					16b	
		es in tax (before credits) fo					
		ear and pre-PFIC years). (
d Foreign to	ax credit. (See instr	uctions.)				16d	
e Subtract	line 16d from line 1	6c. Enter this amount on	your income tax retu	urn as "additional tax." (S	See instructions.)	16e	
		et increase in tax determi					
		of interest here. (See inst					
Part VI		Prior Year Section					
			h outstanding elec	ction. Complete lines	25 and 26 only if ther	e is a partial te	ermination of the section
	1294 election.			1			
		(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year o				1			
	ted earnings to						
which the	election relates						
40 0 4 11							
	ах						
20 Interest accr	ued on deferred						
tax (line 19)	as of the filing date						
	inating election						
	tributed or deemed						
	during the tax year						
	ax due with this			5.407	5.00		
	A A						
	terest due with						
			31=32=30451L		Parkernal last transmission		
	outstanding after						
	nation of election						
	crued after partial						
terminatio	n of election						1

Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

Depa Inter	artment c nai Reve	the Treasury Nue Service Information about Form 8621 and its separate instructions	is at www.irs.gov/form8621	Sequence No. 69
		areholder	Identifying number (see instructions)	
	X M	. & MARJORIE S. FISHER FOUNDATION,	20 1704240	
	C.	reet, and room or suite no. (If a P.O. box, see instructions.)	38-1784340 Shareholder tax year: calendar year 2014 or oth	
		OWNE SQUARE, NO. 920	, and ending	er tax year beginning
		i, state, and ZIP code or country FIELD, MI 48076		
Che	ck type	of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor	Trust Estate
		ssive foreign investment company (PFIC) or qualified electing fund (QEF) AIN VIEW CLO 2014-1 INVESTORS LTD	Employer identification number (if any)	
hhA	ress (Fi	nter number, street, city or town, and country.)	Reference ID number (see instructions)	
		BOX 1093, BOUNDARY HALL, CRICKET SQUARE	MOUNTAINVIEWCLO20141	Ĺ
GR	AND	CAYMAN, CAYMAN ISLANDS KY1-1102	Tax year of PFIC or QEF: calendar year	2014 or other
			tax year beginning	, and
88.		Common of Annual Information (Occiontation)	ending ,	
_	art I	Summary of Annual Information (See instructions.) following information with respect to all shares of the PFIC held by the shareholder:		
1		ription of each class of shares held by the shareholder:		
·		Check if shares jointly owned with spouse.		
2	Date	shares acquired during the taxable year, if applicable:		
3	Num	ber of shares held at the end of the taxable year:		
4	Malu	a of charge held at the and of the torothe reas /about the account to be referred by		
4	(a)	e of shares held at the end of the taxable year (check the appropriate box, if applicable): \$0.50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000	
		If more than \$200,000, list value:	(4) \$100,001 200,000	
	• ,			
5	Туре	of PFIC and amount of any excess distribution or gain treated as an excess distribution un	nder section 1291, inclusion under section	
		, or inclusion or deduction under section 1296:		
	(a)	Section 1291 \$		
	(b) (c)	Section 1293 (Qualified Electing Fund) \$ Section 1296 (Mark to Market) \$		
	(0)	Occion 1230 (Mark to Market) \$\display		
Р	art II			
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as		
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, 1294(c) and 1294(f) and the related regulations for events that terminate this election 951.	o calculate the tax that may be deferred. You may _{not} make this election. Also, se	
С		Election To Mark-to-Market PFIC Stock . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). <i>Complete Part IV.</i>	et the PFIC stock that is marketable within the	meaning of section
D		Deemed Sale Election . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale o	f my interest in the
E		Deemed Dividend Election . I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess 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 distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V .	or a PFIC to which section 1297(d) applies, ele day of its last tax year as a PFIC under section	ect to treat as an excess 1297(a). <i>Enter</i>
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16. Part V.) PFIC. My holding period in the stock of the S	Section 1297(e)
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V.	iod in the stock of the former PFIC includes th	e termination date, as

Corm	0621	/Day	12.2014)	
-orm	8621	(Kev.	12-2014)	

P	Income From a Qualified Electing Fund (QEF). All QEF sh Election B, also complete lines 8a through 9c. (See instructions.)	areholdei	rs complete lines 6a through 7	7c. If yo	u are making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income			6c	
	Enter your pro rata share of the total net capital gain of the QEF			an in	
	Enter the portion of line 7a that is included in income under section 951 or that may be			11816	
	excluded under section 1293(g)	7Ь		F1 - L	
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amou		t II of the Schedule D		N .
	used for your income tax return. (See instructions.)			7c	
8 a	Add lines 6c and 7c			8a	
	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in bra	ckets)		8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includi	ble in ind	come under section 951,	WAYE !!	
	you may make Election B with respect to the amount on line 8e.				
9 a	Enter the total tax for the tax year (See instructions.)	9a		16.5	
	Enter the total tax for the tax year determined without regard to the amount entered				
	on line 8e	9b			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is	extended	by making		
	Election B			9c	
	art IV Gain or (Loss) From Mark-to-Market Election (See in		,		
10a	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
b	Enter your adjusted basis in the stock at the end of the tax year			10b	
	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am		•		
	on your tax return. If a loss, go to line 11			10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))			11	
	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc		•		
	loss on your tax return		***************************************	12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during th				
	Enter the fair market value of the stock on the date of sale or disposition			13a	
			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	13b	
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as 6	ordinary i	ncome on your		
	tax return. If a loss, go to line 14			13c	
	Enter any unreversed inclusions (as defined in section 1296(d))			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In		•		
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, o			14b	
	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a.				
	return according to the rules generally applicable for losses provided elsewhere in the Cod	e and reg	ulations	14c	
	Note. See instructions in case of multiple sales or dispositions.				

Part V	Distributio	ns From and Di	spositions of S	Stock of a Section	on 1291 Fund (See	instruction	s.)
	Complete a se	eparate Part V for each	ch excess distribut	ion and disposition (s	ee instructions).		
					to the applicable stock. If t		
holding	period of the stock l	began in the current tax	year, see instructions	S		15a	
b Enter the	total distributions	(reduced by the portions	of such distribution:	s that were excess distri	butions but not		
					stock for each of the 3 year		
					e the current tax year)		
c Divide li	ne 15b by 3. (See in	structions if the number	of preceding tax yea	rs is less than 3.)		15c	
d Multiply	line 15c by 125% (1.25)				15d	
e Subtract	line 15d from line 1	15a. This amount, if mor	e than zero, is the ex	cess distribution with re	spect to the applicable stoo	k.	
If there i	s an excess distribu	tion, complete line 16. If	zero or less and you	ı did not dispose of stoci	k during the tax year, do n	ot	
complet	e the rest of Part V.	See instructions if you re	eceived more than or	ne distribution during the	e current tax year. Also,		
see instr	uctions for rules for	reporting a nonexcess	distribution on your i	ncome tax return	•••••	15e	
f Enter ga	in or loss from the o	disposition of stock of a	section 1291 fund or	former section 1291 fu	nd. If a gain,		
complet	e line 16. If a loss, s	how it in brackets and d	o not complete line 1	6		15f	
16 a If there i	s a positive amount	on line 15e or 15f (or bo	oth), attach a stateme	ent for each excess distri	bution and disposition.		
Show yo	ur holding period fo	or each share of stock or	block of shares held	I. Allocate the excess dis	tribution or gain to each da	ıy 📗	
in your h	olding period. Add	all amounts that are allo	cated to days in each	tax year.			
b Enter the	total of the amoun	ts determined in line 16a	that are allocable to	the current tax year and	tax years		
before th	e foreign corporation	on became a PFIC (pre-F	PFIC years). Enter the	se amounts on your inc	ome tax		
return as	other income	***************************************				16b	
		es in tax (before credits)					
d Foreign	ax credit. (See instr	uctions.)				16d	
e Subtract	line 16d from line 1	l6c. Enter this amount o	n your income tax ret	turn as "additional tax." (See instructions.)	16e	
				ng the rates and method			
						16f	
Part VI					tion of Section 12		
	Complete a se	eparate column for ea	ch outstanding ele	ction. Complete lines	25 and 26 only if there	is a partial teri	mination of the section
	1294 election.						
		(i)	(ii)	(iii)	(iv)	(v)	(vi)
	of outstanding						
		-					
	ited earnings to				.]		
which the	election relates						
40.07							
	ax			-			
	rued on deferred						
tax (line 19)	as of the filing date			-			
91 Event terr	ninating election						
	stributed or deemed						
	during the tax year						
			12				
	ax due with this				[H##] HTD:10		
	nterest due with	 					
	autotonding offer		n to y a travel involve in		SCHOOL STATE OF THE STATE OF TH	any a my Hungay	To Service Park to a refere
	coutstanding after	BHILD SOURCESTAN			Desilionaries (Mark St.		IMI MARINA STANSATOR
	crued after partial						
	n of election						
to minali	II OT GIGGBOH	1		I			

Rev. December 2014 Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

Dep	artment o	of the Treasury nue Service Information about Form 8621 and its separate instructions	is at	Attachment Sequence No. 69
Nan	ne of sh	areholder MARJORIE S. FISHER FOUNDATION,	Identifying number (see instructions)	Coquanto No. 00
	IC.		38-1784340	
		reet, and room or suite no. (If a P.O. box, see instructions.) OWNE SQUARE, NO. 920	Shareholder tax year: calendar year 2014 or oth and ending	ner tax year beginning
		n, state, and ZIP code or country FIELD, MI 48076		
		of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor	Trust Estate
		ssive foreign investment company (PFIC) or qualified electing fund (QEF) HON CLO VI, LTD	Employer identification number (if any)	
19	0 E	nter number, street, city or town, and country.) LGIN AVENUE, GEORGE TOWN	Reference ID number (see instructions) MARATHONCLOVI	
GF	CAND	CAYMAN, CAYMAN ISLANDS KY1-9005	Tax year of PFIC or QEF; calendar year	2014 or other
			tax year beginning ending ,	, and
_	Part I	Summary of Annual Information (See instructions.)		
Pro 1		following information with respect to all shares of the PFIC held by the shareholder: cription of each class of shares held by the shareholder: Check if shares jointly owned with spouse.		
2	Date	shares acquired during the taxable year, if applicable:		
3	Num	ber of shares held at the end of the taxable year:		
4	(a)	e of shares held at the end of the taxable year (check the appropriate box, if applicable): \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000 If more than \$200,000, list value:	(d) \$150,001-200,000	
5	Туре	of PFIC and amount of any excess distribution or gain treated as an excess distribution un	nder section 1291, inclusion under section	
	1293	3, or inclusion or deduction under section 1296:		
	(a)	Section 1291 \$		
	(b)	Section 1293 (Qualified Electing Fund) \$		
	(c)	Section 1296 (Mark to Market) \$		
P	art II	Elections (See instructions.)		
A		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 F	Part III.
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, 1294(c) and 1294(f) and the related regulations for events that terminate this election 951.	ne time for payment of tax on the undistribute o calculate the tax that may be deferred. I you may not make this election. Also, se	d earnings and profits
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.		e meaning of section
D		Deemed Sale Election . I, a shareholder on the first day of a PFIC's first tax year as a QEF, PFIC. <i>Enter gain or loss on line 15f of Part V.</i>	, elect to recognize gain on the deemed sale o	f my interest in the
E		Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess 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 of distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	or a PFIC to which section 1297(d) applies, el day of its last tax year as a PFIC under section	ect to treat as an excess 1 1297(a). <i>Enter</i>
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.) PFIC. My holding period in the stock of the S	Section 1297(e)
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	iod in the stock of the former PFIC includes th	ne termination date, as

Form	8621	/Rev	12-2014)	

Р	lart III Income From a Qualified Electing Fund (QEF). All QEF st Election B, also complete lines 8a through 9c. (See instructions.)	nareholders complete lines 6a through	7c. If you are	making
6 8	Enter your pro rata share of the ordinary earnings of the QEF	. 6a	134,18	
_	Enter the portion of line 6a that is included in income under section 951 or that may be			
	excluded under section 1293(g)	. 6b	mun	
(6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	. 7a	EXY	
t	Enter the portion of line 7a that is included in income under section 951 or that may be		2.5	
	excluded under section 1293(g)	. 7b		
(Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amo	unt in Part II of the Schedule D	44 月	
	used for your income tax return. (See instructions.)		7c	
8 8	Add lines 6c and 7c		8a	
t	Enter the total amount of cash and the fair market value of other property distributed		22 NO.	
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	. 8 b =	110.51	
0	Enter the portion of line 8a not already included in line 8b that is attributable to shares			
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	. 8c	117.5	
0	Add lines 8b and 8c		8d	
€	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in bra	ackets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is include	lible in income under section 951,		
	you may make Election B with respect to the amount on line 8e.		16. 7	
	Enter the total tax for the tax year (See instructions.)	. 9a		
b	Enter the total tax for the tax year determined without regard to the amount entered			
	on line 8e			
0	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is			
	Election B		9c	
1 27.77.	art IV Gain or (Loss) From Mark-to-Market Election (See i			
	Enter the fair market value of your PFIC stock at the end of the tax year		10a	
	Enter your adjusted basis in the stock at the end of the tax year		10b	· · · · · · · · · · · · · · · · · · ·
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this an	_		
	on your tax return. If a loss, go to line 11		10c	
	Enter any unreversed inclusions (as defined in section 1296(d))		11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc			
	loss on your tax return		12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the			
	Enter the fair market value of the stock on the date of sale or disposition	13a		
	Enter the adjusted basis of the stock on the date of sale or disposition		13b	
C	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as	•		
	tax return. If a loss, go to line 14		13c	
	Enter any unreversed inclusions (as defined in section 1296(d))		14a	
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In	•		
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a,		14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14c	-		
	return according to the rules generally applicable for losses provided elsewhere in the Coc		14c	

Part V				tock of a Section on and disposition (se	on 1291 Fund (See ee instructions).	instructions.)	
15 a Enter you					to the applicable stock. If	the	
b Enter the t	total distributions (i	reduced by the portion	s of such distributions	that were excess distri	butions but not		· · · · · · · · · · · · · · · · · · ·
					stock for each of the 3 ye		
					e the current tax year)		
c Divide line	15b by 3. (See ins	tructions if the number	r of preceding tax years	s is less than 3.)	•••••	15c	
d Multiply li	ne 15c by 125% (1.	.25)			•••••	15d	_
e Subtract li	ne 15d from line 19	5a. This amount, if mo	re than zero, is the exce	ess distribution with re	spect to the applicable sto	ock.	
If there is	an excess distributi	ion, complete line 16. l	f zero or less and you	did not dispose of stocl	k during the tax year, do	not	
complete:	the rest of Part V. S	Gee instructions if you i	received more than one	e distribution during the	e current tax year. Also,		
			distribution on your in	******		15e	
				ormer section 1291 fu	nd. If a gain,		
			lo not complete line 16	***************************************		15f	
		· · · · · · · · · · · · · · · · · · ·	• •		bution and disposition.		
					tribution or gain to each	day	
			ocated to days in each t	=			
				he current tax year and	•		
		n became a PFIC (pre-	PFIC years). Enter thes	e amounts on your inc	ome tax		
						16b	
			for each tax year in yo				
(other thai	n the current tax ye	ar and pre-PFIC years)	. (See instructions.)			16c	
a Foreign ta	x credit. (See instru	ICTIONS.)			Can in admination - 1	16d	
				g the rates and method	See instructions.)	16e	
						16f	
Part VI	Status of P	rior Vear Section	on 1204 Flectio	ne and Termina	ition of Section 1	204 Flections	
are expenses grades, and and					25 and 26 only if then		tion of the section
	1294 election.	oarate colariir for ce	ion obtaining cice	tion. Complete iines	20 and 20 only in then	s is a partial terrilina	don or the section
	120 / 0/001/0///	(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of	outstanding	(-/		(/			(1.7)
-142							
18 Undistribut							
which the e	lection relates						
19 Deferred tax	·						
20 Interest accru						i	
tax (line 19) a	s of the filing date						
	[-
21 Event termi	nating election						
22 Earnings distr	ibuted or deemed						
	ring the tax year						
23 Deferred tax return	due with this				<u>(5)</u> 10		
24 Accrued int							
25 Deferred tax of		Walliam (10) Zaban (15a)	PATOWA THANKS	ini pinasanusa karini Z		20	
	ation of election			Allew I commission 1881	para esta esta 190 a los estas	ymes in manufilm living	
	rued after partial						
	of election						

Form	8621	(Rev.	12-20	14)

Pa	Income From a Qualified Electing Fund (QEF). All QEF s Election B, also complete lines 8a through 9c. (See instructions.)	shareholde	rs complete lines 6a through 7	7c. If you	ı are making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b	!	200	
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income			6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF			TENE	
	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount		t II of the Schedule D	VICE NO	
	used for your income tax return. (See instructions.)			7c	
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed	1			
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b		### DA	
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in b	rackets)		8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is include	dible in inc	come under section 951,		
	you may make Election B with respect to the amount on line 8e.				
9 a	Enter the total tax for the tax year (See instructions.)	9a			
b	Enter the total tax for the tax year determined without regard to the amount entered				
	on line 8e	9b			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which i	s extended	by making		
	Election B			9c	
1 3000 300	art IV Gain or (Loss) From Mark-to-Market Election (See				
10a	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
	Enter your adjusted basis in the stock at the end of the tax year			10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this a		•		
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. In		•	l l	
	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during t	-		l l	
	Enter the fair market value of the stock on the date of sale or disposition			13a	
				13b	
C	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as	-	•		
	tax return. If a loss, go to line 14	· · · · · · · · · · · · · · · · · · ·		13c	
	Enter any unreversed inclusions (as defined in section 1296(d))			14a	
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. I		-		
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14		-		
	return according to the rules generally applicable for losses provided elsewhere in the Co	de and reg	julations	14c	
	Note. See instructions in case of multiple sales or dispositions.				

Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund Attachment Company of Compan

Internal Revenue Service Information about Form 6021 and its separate instructions	18 at www.irs.gov/form8621 · Sequence No. 09
Name of shareholder	Identifying number (see instructions)
MAX M. & MARJORIE S. FISHER FOUNDATION,	00 4504040
INC.	38-1784340
Number, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other tax year beginning
TWO TOWNE SQUARE, NO. 920	, and ending , .
City or town, state, and ZIP code or country SOUTHFIELD, MI 48076	
Check type of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number (if any)
THL CREDIT WIND RIVER INCOME NOTE 2013-2 LTD	, ,,
Address (Enter number, street, city or town, and country.)	Reference ID number (see instructions)
P.O. BOX 1093, BOUNDARY HALL, CRICKET SQUARE	CREDITWINDRIVERINCOME20132
GRAND CAYMAN, CAYMAN ISLANDS KY1-1102	Tax year of PFIC or QEF: calendar year 2014 or other
	tax year beginning , and
Death Common of Association (2)	ending , .
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:	
Check if shares jointly owned with spouse.	
Check it stidies jointly owned with spouse.	
2 Date shares acquired during the taxable year, if applicable:	
3 Number of shares held at the end of the taxable year:	
4 Value of shares held at the end of the taxable year (check the appropriate box, if applicable):	
(a) \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000
(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 un	nder section 1291, inclusion under section
1293, or inclusion or deduction under section 1296: (a) Section 1291 \$	
(b) Section 1293 (Qualified Electing Fund) \$	
(c) Section 1296 (Mark to Market) \$	
(b)	
Part II Elections (See instructions.)	
A 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	he 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 Note: If any portion of line 6a or line 7a of Part III is includible under section 951	o calculate the tax that may be deferred. • you may — make this election. Also, see sections
1294(c) and 1294(f) and the related regulations for events that terminate this ele	ection.
Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark	tet the PFIC stock that is marketable within the meaning of section
1296(e). Complete Part IV.	
Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of my interest in the
	OFF Abotics and the discussion and the discussion (OFO) about the discussion (OFO).
Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess	
excess distribution is greater than zero, also complete line 16 of Part V.	distribution. Effect this affourt of line 13e of Fait V. II the
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC	or a PEIC to which section 1907(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 15f of Part V.	
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 includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E	n rrio. My notaing period in the stock of the Section 129/(e) Enter the excess distribution on line 15e. Part V. If the excess
distribution is greater than zero, also complete line 16, Part V.	
H Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per	PFIC, within the meaning of Regulations section 1.1298-3(a), and 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	e, Part V. If the excess distribution is greater than zero, also
complete line 16, Part V.	

Part V					on 1291 Fund (See in	nstructions.)	
15 a Enter v		aparate Part V for each			ee instructions). to the applicable stock. If th		-
		(reduced by the portions (104	
		•			stock for each of the 3 years	s	
					re the current tax year)		
c Divide	line 15h by 3. (See in	structions if the number of	of preceding tax year	s is less than 3.)		15c	
	y line 15c by 125% (
					spect to the applicable stock	•••	
		•	•		k during the tax year, do not		
		See instructions if you red		•		`	
		reporting a nonexcess di		-		15e	
		disposition of stock of a se	-			199	-
		how it in brackets and do		,		15f	
		on line 15e or 15f (or bot				1.00 m	
	•	·	• •		tribution or gain to each day		
_		all amounts that are alloca			and an an an an an an an an an an an an an		
_		ts determined in line 16a t	-	•	tax vears		
		on became a PFIC (pre-PF		•	•		
		,,		•		16b	
		es in tax (before credits) fo			•••••		
					••••••	16c	
d Foreign	tax credit. (See instr	uctions.)	• • • • • • • • • • • • • • • • • • • •			16d	
e Subtrac	ct line 16d from line 1	l6c. Enter this amount on	your income tax retu	ırn as "additional tax." (See instructions.)	16e	
		net increase in tax determi				···	
Enter th	ne aggregate amount	of interest here. (See inst	ructions.)		••••••	16f	
Part VI					tion of Section 129		
	Complete a se	eparate column for eac	h outstanding elec	ction. Complete lines	25 and 26 only if there is	a partial termin	ation of the section
	1294 election.						
		(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year	of outstanding				·		
election							
	outed earnings to						
which th	e election relates						
19 Deferred	l tax						
20 Interest ac	crued on deferred						-
tax (line 1	9) as of the filing date						
21 Event ter	rminating election						
22 Earnings	distributed or deemed						
distributed	d during the tax year						
23 Deferred	tax due with this						25
	interest due with						,
this retu	rn						
25 Deferred t	ax outstanding after						
	mination of election						
26 Interest	accrued after partial	T					
terminat	ion of election						

Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

Attachment Department of the Treasu Internal Revenue Service Information about Form 8621 and its separate instructions is at www.irs.gov/form8621 Sequence No. 69 Identifying number (see instructions) Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Number, street, and room or suite no. (If a P.O. box, see instructions.) Shareholder tax year: calendar year 2014 or other tax year beginning TWO TOWNE SQUARE, NO. 920 and ending City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 Individual X Corporation Partnership Check type of shareholder filing the return: S Corporation Nongrantor Trust Estate Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) Employer identification number (if any) THL CREDIT WIND RIVER INCOME NOTE 2014-2 LTD Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) P.O. BOX 1093, BOUNDARY HALL, CRICKET SQUARE CREDITWINDRIVERINCOME 20142 GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 2014 or other Tax year of PFIC or QEF; calendar year tax year beginning and ending Summary of Annual Information (See instructions.) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Check if shares jointly owned with spouse. Date shares acquired during the taxable year, if applicable: Number of shares held at the end of the taxable year: Value of shares held at the end of the taxable year (check the appropriate box, if applicable); \$0-50.000 **(b)** \$50,001-100,000 (c) \$100,001-150,000 (d) \$150,001-200,000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296; Section 1291 \$ Section 1293 (Qualified Electing Fund) \$ Section 1296 (Mark to Market) \$ (c) Part II **Elections** (See instructions.) 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. 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. 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. 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 15f of Part V. 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. 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 15f of Part V. 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. 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.

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P	Election B, also complete lines 8a through 9c. (See instructions.)	areholder	's complete lines 6a through 7	/c. If yo	u are making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a		2018	
	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income			6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a		TO THE	
	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amou		t II of the Schedule D		
	used for your income tax return. (See instructions.)			7c	
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed	1		ZXTA	
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in bra	ckets)		8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includi	ble in ind	come under section 951,		
	you may make Election B with respect to the amount on line 8e.				
9 a	Enter the total tax for the tax year (See instructions.)	9a			
b	Enter the total tax for the tax year determined without regard to the amount entered				
	on line 8e	9b			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is	extended	by making		
	Election B			9c	
indicated by	art IV Gain or (Loss) From Mark-to-Market Election (See in				
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
	Enter your adjusted basis in the stock at the end of the tax year			10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am		•		
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc		•		
	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	_			
	Enter the fair market value of the stock on the date of sale or disposition	13a 13b			
	b Enter the adjusted basis of the stock on the date of sale or disposition				
C	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as of	•		40.	
4.4-	tax return. If a loss, go to line 14			13c	
	Enter any unreversed inclusions (as defined in section 1296(d))			14a	
D	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In			446	
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, of			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a.		•	445	
	return according to the rules generally applicable for losses provided elsewhere in the Cod	e and reg	uiauons	14c	
	Note. See instructions in case of multiple sales or dispositions.				

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Part V	Distributio	ns From and Di	spositions of	Stock of a Section	on 1291 Fund (See	instructio	
				ion and disposition (s			
					to the applicable stock. If t		
						15a	
				s that were excess distri			
					stock for each of the 3 year		
					e the current tax year)		
			r of preceding tax yea	rs is less than 3.)			
	15c by 125% (1						
			·		spect to the applicable stoo		
					k during the tax year, do no	^{)t}	
				ne distribution during the	* .	45-	
					ad If a gain	15e	
				former section 1291 fu		454	
		how it in brackets and (•	ent for each excess distri	hution and disposition	15f	
					tribution or gain to each da		
		all amounts that are allo			undution of yain to each us	y	
				the current tax year and	tay waare		
				ese amounts on your inc	-		
return as other	or income		•	_		16b	
		s in tax (before credits)					
	-	•				16c	
e Subtract line	16d from line 1	6c. Enter this amount of	n your income tax re	turn as "additional tax." (See instructions.)	16e	······································
				ing the rates and method			
						16f	
					tion of Section 12		ons
(Complete a se	eparate column for ea	ach outstanding ele	ection. Complete lines	25 and 26 only if there	is a partial te	ermination of the section
	1294 election.						
		(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of our				-			
election							
18 Undistributed							
which the elec	tion relates						
20 Interest accrued							
tax (line 19) as of	the filing date						
04 5							
21 Event terminat							
22 Earnings distribu							
distributed during							
23 Deferred tax d					10.20		
return 24 Accrued intere		· -					
this return		N Zná vento-romo	industrial and a	West to a second		wie Pinesty	likos leeri sysellynning abay
partial termination	-	MARINESSO CHANANTAS	CONTRACTOR OF THE CONTRACTOR	MENTAL SECTION	NIMATERIA SANON BENIN SAN		
26 Interest accrue							
termination of							
to minution of		·					

Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund Attachment

Internal Reve	nue Service Information about Form 8621 and its separate instructions	is at www.irs.gov/form8621	Sequence No. 69
Name of sh	areholder	Identifying number (see instructions)	
MAX M	. & MARJORIE S. FISHER FOUNDATION,	20 1704240	
	reet, and room or suite no. (If a P.O. box, see instructions.)	38-1784340 Shareholder tax year: calendar year 2014 or other	
	OWNE SQUARE, NO. 920	shareholder tax year: calendar year 201 = or other	ar tax year beginning
	n, state, and ZIP code or country	, also or any	
	FIELD, MI 48076		
	of shareholder filing the return: Individual X Corporation Partnersh		Trust Estate
	ssive foreign investment company (PFIC) or qualified electing fund (QEF) Y XVIII CLO, LTD	Employer identification number (if any)	
GMUM	I AVIII CHO, HID		
Address (E	nter number, street, city or town, and country.)	Reference ID number (see instructions)	
	LGIN AVENUE, GEORGE TOWN	GALAXYXVIIICLO	
GRAND	CAYMAN, CAYMAN ISLANDS KY1-9005	Tax year of PFIC or QEF; calendar year	2014 or other
		tax year beginning	, and
Part I	Summary of Annual Information (See instructions.)	ending ,	•
	following information with respect to all shares of the PFIC held by the shareholder:		
	ription of each class of shares held by the shareholder:		
	Check if shares jointly owned with spouse.		
2 Date	shares acquired during the taxable year, if applicable:		
3 Num	ber of shares held at the end of the taxable year:		
4 Value	e of shares held at the end of the taxable year (check the appropriate box, if applicable):		
(a)		(d) \$150,001-200,000	
(e)	If more than \$200,000, list value:		
	of PFIC and amount of any excess distribution or gain treated as an excess distribution u	nder section 1291, inclusion under section	
1293 (a)	8, or inclusion or deduction under section 1296: Section 1291 \$		
(a) (b)	Section 1291 (Qualified Electing Fund) \$		
(c)	Section 1296 (Mark to Market) \$		
			,
Part II			
	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as		
ВШ	Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend to the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951 1294(c) and 1294(f) and the related regulations for events that terminate this election 951 1294(c) are the second section 951 1294(c) and 1294(f) and the related regulations for events that terminate this election 951 1294(c) are the second section 951 1294(c) and 1294(f) and the related regulations for events that terminate this election 951 1294(c) and	o calculate the tax that may be deferred. vou maynee make this election. Also, se	
c \square	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.		meaning of section
D	Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	elect to recognize gain on the deemed sale of	f my interest in the
E 🗆	Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess		
	excess distribution is greater than zero, also complete line 16 of Part V.	and and an one of the	
F \square	Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	or a PFIC to which section 1297(d) applies, eleday of its last tax year as a PFIC under section	ect to treat as an excess 1297(a). <i>Enter</i>
G \square	Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). <i>E</i>	e) PFIC. My holding period in the stock of the S	Section 1297(e)
	distribution is greater than zero, also complete line 16, Part V.		
н 🗀	Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	riod in the stock of the former PFIC includes th	e termination date, as

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Pa	Election B, also complete lines 8a through 9c. (See instructions.)	areholde	rs complete lines 6a through 1	7c. If you	are making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			· _
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $ \dots $			6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	. 7a		SECTION.	
b	Enter the portion of line 7a that is included in income under section 951 or that may be			Little To	
	excluded under section 1293(g)	. 7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amou	ınt in Par	t II of the Schedule D		
	used for your income tax return. (See instructions.)			7c	·
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	. 8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	. 8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in bra	ckets)		8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is including	ible in in	come under section 951,	z Minas	
	you may make Election B with respect to the amount on line 8e.				
9 a	Enter the total tax for the tax year (See instructions.)	. 9a			
b	Enter the total tax for the tax year determined without regard to the amount entered				
	on line 8e	9b			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is	extende	l by making		
	Election B			9c	
	rt IV Gain or (Loss) From Mark-to-Market Election (See in		<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
b	Enter your adjusted basis in the stock at the end of the tax year			10b	
	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am		,		
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc		-		
	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during th	_			
a Enter the fair market value of the stock on the date of sale or disposition					
b Enter the adjusted basis of the stock on the date of sale or disposition			13b		
C	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as	ordinary	ncome on your	1	
	tax return. If a loss, go to line 14			13c	
	Enter any unreversed inclusions (as defined in section 1296(d))			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In				
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, (14b	
	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a				
	return according to the rules generally applicable for losses provided elsewhere in the Cod	e and reg	Julations	14c	
	Note. See instructions in case of multiple sales or dispositions.				

	a separate Part V for each	-		•	istructions.)
	itions from the section 1291 f				<u>. </u>	
	ock began in the current tax y					
	ons (reduced by the portions				··· -194	
	er section 1291(a)(1)(B)) ma					
	ax year (or if shorter, the port					
	ee instructions if the number					
	5% (1.25)					
e Subtract line 15d from	line 15a. This amount, if more	than zero is the exce	ess distribution with re	snect to the applicable stock		
	tribution, complete line 16. If			• • • • • • • • • • • • • • • • • • • •		
	rt V. See instructions if you re					
•	s for reporting a nonexcess of			ourrent ax year. Also,	15e	
	the disposition of stock of a s					
	ss, show it in brackets and do				15f	
	ount on line 15e or 15f (or bo			hution and disposition		
	od for each share of stock or					
	Add all amounts that are alloc			a look on or gain to each day		
	ounts determined in line 16a		-	tay years		
	pration became a PFIC (pre-P		•	-		
return as other income	**		-		16b	
	reases in tax (before credits)			•••••		
	tax year and pre-PFIC years).				16c	
d Foreign tax credit. (See						
	ine 16c. Enter this amount or	vour income tax retu	rn as "additional tax." (See instructions.)	16e	
	ach net increase in tax determ					
	ount of interest here. (See ins				16f	
Part VI Status	of Prior Year Sectio	n 1294 Election	ns and Termina	tion of Section 129	4 Election	S
	a separate column for eac					
1294 elec						
-	(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of outstanding						
election						
18 Undistributed earnings to)					
which the election relates						
19 Deferred tax						
20 Interest accrued on deferred						
tax (line 19) as of the filing da	te					
		_				
21 Event terminating election	n					
22 Earnings distributed or deem	ed					
distributed during the tax yea	r			3		
23 Deferred tax due with this	3			(647)		
return						
24 Accrued interest due with	1 1			}		
this return						
25 Deferred tax outstanding after						
partial termination of election						
26 Interest accrued after par		l				
termination of election						

Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund Attachment

Internal Reve	nue Service Information about Form 8621 and its separate instructions	is at www.irs.gov/form8621	Sequence No. 69			
Name of sh	areholder	Identifying number (see instructions)				
MAX M	. & MARJORIE S. FISHER FOUNDATION,	38-1784340				
Number, st	reet, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other	er tax year beginning			
	OWNE SQUARE, NO. 920	and ending	,			
	n, state, and ZIP code or country FIELD, MI 48076					
Check type	of shareholder filing the return: Individual X Corporation Partnersh	ip S Corporation Nongrantor 1	rust Estate			
	ssive foreign investment company (PFIC) or qualified electing fund (QEF) WOOD PARK INCOME NOTE LTD	Employer identification number (if any)				
	nter number, street, city or town, and country.) ON HOUSE, 75 FORT ST, GEORGE TOWN	Reference ID number (see instructions) BIRCHWOODPARKINCOME				
GRAND	CAYMAN, CAYMAN ISLANDS KY1-1108	Tax year of PFIC or QEF: calendar year	2014 or other			
		tax year beginning ending .	, and			
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 Desc	ription of each class of shares held by the shareholder:					
	Check if shares jointly owned with spouse.					
2 Date	shares acquired during the taxable year, if applicable:					
3 Num	ber of shares held at the end of the taxable year:					
(a)						
5 Type	of PFIC and amount of any excess distribution or gain treated as an excess distribution u	nder section 1291, inclusion under section	*			
1293	3, or inclusion or deduction under section 1296:					
(a)	Section 1291 \$					
(b)	Section 1293 (Qualified Electing Fund) \$					
(c)	Section 1296 (Mark to Market) \$					
Part II	Elections (See instructions.)					
	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	a OFF. Complete lines 6a through 7c of P	art III			
В	Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend to the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951 1294(c) and 1294(f) and the related regulations for events that terminate this election 951 1294(c) and 1294(f) and the related regulations for events that terminate this election 951 1294(c) and 1294(f) and 1294(f) and the related regulations for events that terminate this election 951 1294(c) and 1294(f) and 1294(f) and the related regulations for events that terminate this election 951 1294(f) and 1294(f) an	he time for payment of tax on the undistributed o calculate the tax that may be deferred. • you may not make this election. Also, se	d earnings and profits			
c 🗆	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the	meaning of section			
ם 🗆	Deemed Sale Election . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of	my interest in the			
E	Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	QEF that is a controlled foreign corporation (C distribution. <i>Enter this amount on line 15e</i>	FC), elect to treat an of Part V. If the			
F \square	Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	or a PFIC to which section 1297(d) applies, ele day of its last tax year as a PFIC under section	ect to treat as an excess 1297(a). <i>Enter</i>			
G \square	Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Edistribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the S	Section 1297(e)			
н 🗆	Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	riod in the stock of the former PFIC includes the	e termination date, as			

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P	Election B, also complete lines 8a through 9c. (See instructions.)	areholders	s complete lines 6a through 7	c. If yo	u are making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a		1-77	
	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C				6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF			Tiens	
	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amou		II of the Schedule D	100	
	used for your income tax return. (See instructions.)			7c	
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed			HXEN:	
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c			
d	Add lines 8b and 8c			8d	
е		ckets)		8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is including			34 J. M	
	you may make Election B with respect to the amount on line 8e.		,		
9 a	Enter the total tax for the tax year (See instructions.)	9a			
	Enter the total tax for the tax year determined without regard to the amount entered				
	on line 8e	9ь			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is		by making		
_	Election B		• 17	9c	
P	art IV Gain or (Loss) From Mark-to-Market Election (See in	structi	ons.)		
10a	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
	Enter your adjusted basis in the stock at the end of the tax year			10b	
	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am				
	on your tax return. If a loss, go to line 11		-	10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))			11	
	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Incl				
	loss on your tax return			12	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the				
a	Enter the fair market value of the stock on the date of sale or disposition			13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition			13b	
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as of				
	tax return. If a loss, go to line 14	-	-	13c	
14a	Enter any unreversed inclusions (as defined in section 1296(d))			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In				
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, or			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a.				
	return according to the rules generally applicable for losses provided elsewhere in the Cod		•	14c	
	Note: Con instructions in case of multiple sales or dispositions		***************************************		

Part V Distribut	ions From and Di	spositions of S	tock of a Section	on 1291 Fund (See ins	tructions.)	
Complete a	separate Part V for each	ch excess distributio	on and disposition (se	ee instructions).		
15 a Enter your total distribution						
holding period of the stoc	k began in the current tax	year, see instructions			15a	
b Enter the total distribution						
included in income under	section 1291(a)(1)(B)) ma	ade by the fund with re	spect to the applicable	stock for each of the 3 years		
preceding the current tax	year (or if shorter, the por	tion of the shareholder	's holding period befor	e the current tax year)	15b	
c Divide line 15b by 3. (See	instructions if the number	of preceding tax years	s is less than 3.)		15c	
					15d	
e Subtract line 15d from lin	e 15a. This amount, if mor	e than zero, is the exce	ess distribution with res	spect to the applicable stock.		
If there is an excess distri	bution, complete line 16. l	f zero or less and you	did not dispose of stock	k during the tax year, do not		
	V. See instructions if you r		•			
					15e	
f Enter gain or loss from th					100	
	, show it in brackets and d				15f	
16 a If there is a positive amou						
	•	•		tribution or gain to each day		
	ld all amounts that are allo			and another game to due to day		
b Enter the total of the amou				tay years		
	ation became a PFIC (pre-f		-	•		
	**	- ,			16b	
return as other income c Enter the aggregate increa	sees in tay (hefore credits)	for each tay year in yo	ur holding period		100	
					16c	
					16d	
a Subtract line 16d from line	a 16c Enter this amount o	n vour income tay retu	urn ac "additional tay " /	See instructions.)	16e	
f Determine interest on each					106	
				5 01 56011011 002 1.	16f	
Part VI Status of	Prior Vear Section	on 1204 Election	ne and Termina	tion of Section 1294		
				25 and 26 only if there is a		
1294 electio		cri outstarium y elec	don. Complete illies	25 and 26 only if there is a	partiai terriii	ation of the section
1234 6/6000	(i)	(ii)	(iii)	(iv)	(u)	(4)
17 Tax year of outstanding	(")	(11)	(111)	(14)	(v)	(vi)
election						
18 Undistributed earnings to which the election relates	·					
which the election relates						
40. D-4						
19 Deferred tax	·					
20 Interest accrued on deferred						
tax (line 19) as of the filing date						
Od. Franklanni-Alexani-A						
21 Event terminating election						
22 Earnings distributed or deemed				43		
distributed during the tax year						
23 Deferred tax due with this						
return				TO STATE OF THE ST		
24 Accrued interest due with						
this return						
25 Deferred tax outstanding after						
partial termination of election						
26 Interest accrued after partia	al					
termination of election	.					
					Forr	n 8621 (Rev. 12-2014)

Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund Attachment Sources No. 69

Internal Revenue Service Information about Form 6021 and its separate instructions	S IS at www.irs.gov/form8621 · Sequence No. 09			
Name of shareholder	Identifying number (see instructions)			
MAX M. & MARJORIE S. FISHER FOUNDATION,	20 1704240			
INC • Number, street, and room or suite no. (If a P.O. box, see instructions.)	38-1784340			
TWO TOWNE SQUARE, NO. 920	Shareholder tax year: calendar year 2014 or other tax year beginning			
City or town, state, and ZIP code or country	, and ending , .			
SOUTHFIELD, MI 48076				
Check type of shareholder filing the return: Individual X Corporation Partnersh	nip S Corporation Nongrantor Trust Estate			
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number (if any)			
CIFC FUNDING 2014 INVESTOR LTD				
Address (Enter number, street, city or town, and country.)	Reference ID number (see instructions)			
P.O. BOX 1093, BOUNDARY HALL, CRICKET SQUARE	CIFCFUNDING2014			
GRAND CAYMAN, CAYMAN ISLANDS KY1-1102	Tax year of PFIC or QEF: calendar year 2014 or other			
	tax year beginning , and			
	ending , .			
Part I Summary of Annual Information (See instructions.)				
Provide the following information with respect to all shares of the PFIC held by the shareholder:				
Description of each class of shares held by the shareholder: Check if shares jointly owned with spouse.				
Check it Shales joining owned with spouse.				
2 Date shares acquired during the taxable year, if applicable:				
Number of shares held at the end of the taxable year:				
4 Value of shares held at the end of the taxable year (check the appropriate box, if applicable): (a) \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000			
(e) If more than \$200,000, list value:	(u) = \$130,001-200,000			
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution u	nder section 1291, inclusion under section			
1293, or inclusion or deduction under section 1296;				
(a) Section 1291 \$				
(b) Section 1293 (Qualified Electing Fund) \$				
(c) Section 1296 (Mark to Market) \$				
Part II Elections (See instructions.)				
A 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 to	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 t Note: If any portion of line 6a or line 7a of Part III is includible under section 951	1. vou mav _{not} make this election. Also, see sections			
1294(c) and 1294(f) and the related regulations for events that terminate this el	lection.			
Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mar 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section			
D Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEI	F elect to recognize gain on the deemed sale of my interest in the			
PFIC. Enter gain or loss on line 15f of Part V.	, stock to recognize gain on the decined sale of my interest in the			
E Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a	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 Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last	or a PFIC to which section 1297(d) applies, elect to treat as an excess			
gain on line 15f of Part V.	our of no more any your as a fire under section 1237 (a). Eitler			
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(PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). It	a) PFIU. My holding period in the stock of the Section 1297(e) Enter the excess distribution on line 15e. Part V. If the excess			
distribution is greater than zero, also complete line 16, Part V.				
H Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per	PFIC, within the meaning of Regulations section 1.1298-3(a), riod 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 150	e, Part V. If the excess distribution is greater than zero, also			

Pa	art III Income From a Qualified Electing Fund (QEF). All QEF Election B, also complete lines 8a through 9c. (See instructions.)	shareholders complete lines 6	a through 7c. If you are making	
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a		*
b	Enter the portion of line 6a that is included in income under section 951 or that may be)	(0.185)	
	excluded under section 1293(g)	6b		
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income		6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a		
b	Enter the portion of line 7a that is included in income under section 951 or that may be)		
	excluded under section 1293(g)	7b	1.0(17)	
C			D	
	used for your income tax return. (See instructions.)	***************************************	7c	
8 a	Add lines 6c and 7c			
b	Enter the total amount of cash and the fair market value of other property distributed			
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b	- P. V.S.	
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares			
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c		
d			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in t	orackets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is inclu	idible in income under sect	ion 951,	
	you may make Election B with respect to the amount on line 8e.		45/44	
	Enter the total tax for the tax year (See instructions.)	9a	124 116	
b	Enter the total tax for the tax year determined without regard to the amount entered		74.77	
	on line 8e			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which	• •	3200	
	Election B		9с	
	art IV Gain or (Loss) From Mark-to-Market Election (See			
	Enter the fair market value of your PFIC stock at the end of the tax year			
	Enter your adjusted basis in the stock at the end of the tax year		10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this a	•	1	
	on your tax return. If a loss, go to line 11			
11	Enter any unreversed inclusions (as defined in section 1296(d))		11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. I		· 1 1	
40	loss on your tax return		12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during		100	
	Enter the fair market value of the stock on the date of sale or disposition			
	Enter the adjusted basis of the stock on the date of sale or disposition		13b	
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount a	, ,	40.	
	tax return. If a loss, go to line 14			
	Enter any unreversed inclusions (as defined in section 1296(d))			
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14.		· 1 1	
	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 1			
	The state of the s	4a. moidue ims amount on yo	וונפג	
	return according to the rules generally applicable for losses provided elsewhere in the C	ode and regulations	14c	

	LIONS From and Di			•	e instructions.)	
15 a Enter your total distribut	a separate Part V for ea				ftho	
	ck began in the current tax					
- •	ns (reduced by the portion			hutions but not	15a	
	r section 1291(a)(1)(B)) m				oore	
	year (or if shorter, the por					
	e instructions if the number					
d Multiply line 15c by 125°	ne 15a. This amount, if mo			annet to the applicable at		
		· ·				
	ibution, complete line 16. I				not	
	V. See instructions if you r				45.	
	for reporting a nonexcess		(0.755.5		15e	
f Enter gain or loss from t					1 454	
	s, show it in brackets and c	•		ibution and disposition	15f	Web Int - Treats -
16 a If there is a positive amo						
	d for each share of stock o			uribution or gain to each	day	
	dd all amounts that are allo		=	l tax vanna		
	ounts determined in line 16 ration became a PFIC (pre-l		•	•		
	•	• ,	•		105	
return as other income c Enter the aggregate incre	anno in toy (hafara aradita)				16b	
					100	
d Foreign toy gradit (Coa i	x year and pre-PFIC years)	. (See instructions.)			16c	
a Subtract line 16d from li	nstructions.) ne 16c. Enter this amount o	on vour income toy retu	rn an "additional tour" /	Can instructions \	16d	
f Determine interest on ea					16e	· · · · · · · · · · · · · · · · · · ·
	unt of interest here. (See in				16f	
Part VI Status o	f Prior Year Section	on 1204 Election	ne and Tormina	tion of Soction 1	101 1204 Elections	
	a separate column for ea					
1294 electi		cir outstanding elec	tion. Complete lines	23 and 20 only it the	e is a partial termin	ation of the section
7254 67661	(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of outstanding	(1)	(")	(111)	(14)	(v)	(VI)
alaatia a						
18 Undistributed earnings to						
which the election relates				}		
Willow the election relates						
19 Deferred tax						
20 Interest accrued on deferred						
tax (line 19) as of the filing date						
tax (mile 19) as of the ining date	'					
21 Event terminating election						
22 Earnings distributed or deeme					·	
distributed during the tax year	<i>'</i>					
23 Deferred tax due with this	2					
24 Accrued interest due with						
this return						
25 Deferred tax outstanding after	ars erance	beta ee sele i hint		folder film fon er Besse	10 3 1 1 1 0 m	TEN SIGN NO LUIG
partial termination of election		VI V				S -WILLIAM
partial termination of election						
26 Interest accrued after part	lat					

Information Return by a Shareholder of a Passive Foreign OMB No. 1545-1002 **Investment Company or Qualified Electing Fund**

Attachment epartment of the Treasury Information about Form 8621 and its separate instructions is at www.irs.gov/form8621 Sequence No. 69 Internal Revenue Service Name of shareholder Identifying number (see instructions) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Number, street, and room or suite no. (If a P.O. box, see instructions.) Shareholder tax year: calendar year 2014 or other tax year beginning TWO TOWNE SQUARE, NO. 920 and ending City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 Check type of shareholder filing the return: Individual X Corporation Partnership S Corporation Mongrantor Trust _ Estate Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) Employer identification number (if any) CIFC FUNDING 2014-V WAREHOUSE SUBSIDIARY LTD Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) P.O. BOX 1093, BOUNDARY HALL, CRICKET SQUARE CIFCFUNDING2014VWAREHOUSE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 2014 or other Tax year of PFIC or QEF; calendar year tax year beginning and ending Summary of Annual Information (See instructions.) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Check if shares jointly owned with spouse. Date shares acquired during the taxable year, if applicable: Number of shares held at the end of the taxable year: Value of shares held at the end of the taxable year (check the appropriate box, if applicable): (b) \$50,001-100,000 (c) \$100,001-150,000 ____ \$150,001-200,000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296: Section 1293 (Qualified Electing Fund) \$ (b) Section 1296 (Mark to Market) \$ Part II Elections (See instructions.) 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. 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 or 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. Lection 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. 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 15f of Part V. 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. 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 15f of Part V. 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. 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.

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Form	8621	(Rev.	12-2014)	

P	Income From a Qualified Electing Fund (QEF). All QEF shareholders Election B, also complete lines 8a through 9c. (See instructions.)	s complete lines 6a through 7c.	. If you are making
6 a	a Enter your pro rata share of the ordinary earnings of the QEF 6a		
b			
	excluded under section 1293(g) 6b	S	200
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income		6c
7 a	a Enter your pro rata share of the total net capital gain of the QEF	1	
	Enter the portion of line 7a that is included in income under section 951 or that may be		
	excluded under section 1293(g)		200
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount in Part	II of the Schedule D	
	used for your income tax return. (See instructions.)		7c
8 a	Add lines 6c and 7c		8a
b	Enter the total amount of cash and the fair market value of other property distributed		
	or deemed distributed to you during the tax year of the QEF. (See instructions.)		
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares		
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year 8c		
d	Add lines 8b and 8c		8d
е			8e
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible in inc	ome under section 951,	
	you may make Election B with respect to the amount on line 8e.		0000
9 a	Enter the total tax for the tax year (See instructions.)		NOTE OF THE PARTY
b	Enter the total tax for the tax year determined without regard to the amount entered		
	on line 8e9b		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended	by making	
	Election B		9c
1405-400	art IV Gain or (Loss) From Mark-to-Market Election (See instruction		
	Enter the fair market value of your PFIC stock at the end of the tax year		10a
b	Enter your adjusted basis in the stock at the end of the tax year		10b
C	: Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as or	· ·	
	on your tax return. If a loss, go to line 11		10c
	Enter any unreversed inclusions (as defined in section 1296(d))		11
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this a		
	loss on your tax return		12
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year		a.
	Enter the fair market value of the stock on the date of sale or disposition		13a
	Enter the adjusted basis of the stock on the date of sale or disposition	_	13b
	: Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary in	· 1	
	tax return. If a loss, go to line 14		13c
	Enter any unreversed inclusions (as defined in section 1296(d))		14a
þ	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this		
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete li		14b
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include the		
	return according to the rules generally applicable for losses provided elsewhere in the Code and regu	ulations	14c
	Note. See instructions in case of multiple sales or dispositions.		

Part V Distribution	ons From and Di	spositions of S	Stock of a Section	on 1291 Fund (See	instructions	s.)
Complete a s	eparate Part V for ea	ch excess distributi	on and disposition (se	ee instructions).		•
15 a Enter your total distribution						
holding period of the stock	began in the current tax	year, see instructions	***************************************		15a	
included in income under s	ection 1291(a)(1)(B)) m	ade by the fund with r	espect to the applicable	stock for each of the 3 ye	ars	
preceding the current tax ye	ear (or if shorter, the por	tion of the shareholde	r's holding period befor	e the current tax year)	15b	
e Subtract line 15d from line	15a. This amount, if mo	e than zero, is the exc	ess distribution with re	spect to the applicable sto	ck.	
If there is an excess distribu	ıtion, complete line 16. I	f zero or less and you	did not dispose of stock	k during the tax year, do n	ot	
				To the state of th	15e	
f Enter gain or loss from the	disposition of stock of a	section 1291 fund or				
complete line 16. If a loss, s	show it in brackets and c	lo not complete line 16	6		15f	
16 a If there is a positive amount	t on line 15e or 15f (or b	oth), attach a stateme				
Show your holding period f	or each share of stock o	r block of shares held.	Allocate the excess dis	tribution or gain to each d	ay	
in your holding period. Add	all amounts that are allo	cated to days in each	tax year.			
b Enter the total of the amoun	its determined in line 16	a that are allocable to	the current tax year and	tax years		
before the foreign corporati	on became a PFIC (pre-l	PFIC years). Enter the	se amounts on your inco	ome tax		
return as other income					16b	
c Enter the aggregate increas	es in tax (before credits)	for each tax year in y	our holding period			
(other than the current tax y	ear and pre-PFIC years)	. (See instructions.)			16c	
e Subtract line 16d from line	16c. Enter this amount o	n your income tax ret	urn as "additional tax." (See instructions.)	16e	
f Determine interest on each	net increase in tax deter	mined on line 16e usir	ng the rates and method	s of section 6621.		
Enter the aggregate amount	t of interest here. (See in	structions.)			16f	
Part VI Status of	Prior Year Section	on 1294 Election	ns and Termina	tion of Section 1	294 Election	ns
Complete a s	eparate column for ea	ach outstanding elec	ction. Complete lines	25 and 26 only if there	is a partial terr	nination of the section
1294 election	1.					
	(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of outstanding					•	
election						
18 Undistributed earnings to						
which the election relates						
19 Deferred tax						
20 Interest accrued on deferred						
tax (line 19) as of the filing date						
21 Event terminating election						
22 Earnings distributed or deemed						
distributed during the tax year						
23 Deferred tax due with this				_		
return						
24 Accrued interest due with						
			In the Company Alle Company			
25 Deferred tax outstanding after						
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. (See instructions if the number of preceding tax years is less than 3.) 15c d Multiply line 15c 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, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year, do not complete the rest of Part V. See instructions of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and do not complete line 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period dor each share of stock or block of shares held. Allocate the excess distribution and disposition. Show your holding period dot all amounts that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). See instructions.) 16b 16c 16 Fine the aggregate increases in tax (before credits) for each tax year in your holding period dother than the current tax year and pre-PFIC years). (See instructions.) 16d 16e Foreign tax credit. (See instructions.) 16d 16e Foreign tax credit. (See instructions.) 16d 16e Foreign tax credit. (See instructions.) 16e 16e Foreign tax credit (See instructions.) 16f 16e Foreign						
·						

Information Return by a Shareholder of a Passive Foreign OMB No. 1545-1002 Investment Company or Qualified Electing Fund

Attachment Department of the Treasury ▶ Information about Form 8621 and its separate instructions is at www.irs.gov/form8621 Sequence No. 69 Name of shareholder Identifying number (see instructions) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Number, street, and room or suite no. (If a P.O. box, see instructions.) Shareholder tax year: calendar year 2014 or other tax year beginning TWO TOWNE SQUARE, NO. 920 and ending City or town, state, and ZIP code or country 48076 SOUTHFIELD, MI Individual X Corporation Partnership Check type of shareholder filing the return: S Corporation Mongrantor Trust Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) Employer identification number (if any) CIFC FUNDING 2014-V INVESTOR LTD Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) P.O. BOX 1093, BOUNDARY HALL, CRICKET SQUARE CIFCFUNDING2014V 2014 or other GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 Tax year of PFIC or QEF; calendar year tax year beginning and ending Part I Summary of Annual Information (See instructions.) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Check if shares jointly owned with spouse. Date shares acquired during the taxable year, if applicable: Number of shares held at the end of the taxable year: Value of shares held at the end of the taxable year (check the appropriate box, if applicable): (b) \$50,001-100,000 (c) \$100,001-150,000 (d) \$150,001-200,000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296: | Section 1291 \$ Section 1293 (Qualified Electing Fund) \$ (b) Section 1296 (Mark to Market) \$ (c) L Part II Elections (See instructions.) 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. 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. 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. 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 15f of Part V. 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. 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 15f of Part V. 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. 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.

Form 8621 (Rev. 12-201	4١

	Election B, also complete lines 8a through 9c. (See instructions.)	latenoluers complete lines oa ultough i	rc. II you	are making
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a		
	Enter the portion of line 6a that is included in income under section 951 or that may be			
	excluded under section 1293(g)	6b		
C			6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF		8 - F. S. W	
	Enter the portion of line 7a that is included in income under section 951 or that may be			
	excluded under section 1293(g)	. 7b		
C				
	used for your income tax return. (See instructions.)		7c	
8 a	Add lines 6c and 7c		8a	
b	Enter the total amount of cash and the fair market value of other property distributed			
	or deemed distributed to you during the tax year of the QEF. (See instructions.)	8b		
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares			
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	. 8c		
đ	***************************************		8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in bra	ickets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is include	ible in income under section 951,		
	you may make Election B with respect to the amount on line 8e.			
9 a	Enter the total tax for the tax year (See instructions.)	. 9a		
b	Enter the total tax for the tax year determined without regard to the amount entered			
	on line 8e	9b		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is	extended by making		
	Election B		9c	<u></u>
1 47 27	art IV Gain or (Loss) From Mark-to-Market Election (See in			
	Enter the fair market value of your PFIC stock at the end of the tax year		10a	
	Enter your adjusted basis in the stock at the end of the tax year		10b	
	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this am	<u>-</u>	l .= l	
	on your tax return. If a loss, go to line 11		10c	
	Enter any unreversed inclusions (as defined in section 1296(d))		11	
	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inc			
	loss on your tax return		12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during th			
	Enter the fair market value of the stock on the date of sale or disposition		13a	
	Enter the adjusted basis of the stock on the date of sale or disposition		13b	
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as	•		
	tax return. If a loss, go to line 14		13c	
	Enter any unreversed inclusions (as defined in section 1296(d))		14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. In			
	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a,		14b	
	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a		440	
	return according to the rules generally applicable for losses provided elsewhere in the Cod	e and regulations	14c	

	ns From and Disponents			•	e instructio	ns.)
					If the	
b Enter the total distributions (r	educed by the portions (of such distributions	that were excess distrib	outions but not		
					years	
e Subtract line 15d from line 15	a. This amount, if more	than zero, is the exce	ess distribution with res	pect to the applicable s	tock.	
		•			1 1	
			=			
		-	*******		135	
					15f	
	·	•		•	20 7000	
				and an or gam to buo.		
		•	•	tax vears		
				•	2	
	•	•	-		16b	
				***************************************	133	
					16c	
d Foreign tax credit. (See instru	ctions.)	,	••••••	•••••••••••••••••••••••••••••••••••••••	16d	
e Subtract line 16d from line 16	In the section 1291 fund during the current tax year with respect to the applicable stock. If the kepan in the current tax year, see instructions (reduced by the portions of such distributions that were excess distributions but not section 129(14) (1(8)) made by the fund with respect to the applicable stock for each of the 3 years year (or if shorter, the portion of the shareholder's holding period before the current tax year) (125) 15a. 15a. 15h amount, if more than zero, is the excess distribution with respect to the applicable stock. Journal of the state of the stock of a section 1291 (1) fund of the with respect to the applicable stock. Journal of the stock of a section 1291 fund of tormer section 1291 fund. If a gain, show it in brackets and do not complete line 16 15a. 15a. 15a. 15a. 15a. 15a. 15a. 15a.					
Enter the aggregate amount o	f interest here. (See inst	ructions.)	-			
						ons
1294 election.			ė		•	
	(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of outstanding				,		
election						
18 Undistributed earnings to						
which the election relates	**					
_						
19 Deferred tax						
20 Interest accrued on deferred						
tax (line 19) as of the filing date						
21 Event terminating election					-38	
22 Earnings distributed or deemed						
distributed during the tax year						
23 Deferred tax due with this						(2)
return	I		<u> </u>			
24 Accrued interest due with						
this return						
25 Deferred tax outstanding after						
partial termination of election						
26 Interest accrued after partial						
termination of election						

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

Attach to your tax return.

► Information about Form 8865 and its separate instructions is at www.irs.gov/form8865 Information furnished for the foreign partnership's tax year

OMB No. 1545-1668

Attachment Sequence No. 118

Department of the Treasury Internal Revenue Service

JAN 1 beginning , 2014, and ending DEC 2014 Name of person filing this return Filer's identifying number MAX M. & MARJORIE S. FISHER FOUNDATION, 38-1784340 INC. Filer's address (if you are not filing this form with your tax return) Category of filer (see Categories of Filers in the instructions and check applicable box(es)): 3 X 1 2 JAN 2014 B beginning DEC 201 , and ending C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$ If filer is a member of a consolidated group but not the parent, enter the following information about the parent; Name EIN Address Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identifying numbe Category 1 | Category 2 Constructive own F1 Name and address of foreign partnership 2(a) EIN (if any) 98-0613069 TRIDENT V, LP 2(b) Reference ID number C/O STONE POINT CAPITAL, LLC 20 HORSENECK LANE 3 Country under whose laws organized GREENWICH, CT 06830 CAYMAN ISLANDS 4 Date of 5 Principal place 6 Principal business 7 Principal business 8a Functional 8b Exchange rate of business organization activity code number activity currency (see instr.) 12/22/2008CONNECTICUT 523900 INVESTMENTS US DOLLAR G Provide the following information for the foreign partnership's tax year: 1 Name, address, and identifying number of agent (if any) in the United States 2 Check if the foreign partnership must file: X Form 1065 or 1065-B X Form 8804 Service Center where Form 1065 or 1065-B is filed: E-FILE A Name and address of person(s) with custody of the books and records of the foreig partnership, and the location of such books and records, if different 3 Name and address of foreign partnership's agent in country of organization, if any Were any special allocations made by the foreign partnership? X No Enter the no. of Forms 8858, Info Return of U.S. Persons With Respect To Foreign Disregarded Entities, attached to this return How is this partnership classified under the law of the country in which it is organized? ► EXEMPT LTD 8a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that is a separate unit under Reg. 1.1503(d)-1(b)(4) or part of a combined separate unit under Reg. 1.1503(d)-1(b)(4)(ii)? If "No," skip question 8b. No Yes b If "Yes," does the separate unit or combined separate unit have a dual consolidated loss as defined in Reg. 1.1503(d)-1(b)(5)(ii)? Does this partnership meet **both** of the following requirements?

The partnership's total receipts for the tax year were less than \$250,000 and

The value of the partnership's total assets at the end of the tax year was less than \$1 million. If "Yes," **do not** complete Schedules L, M-1, and M-2. Yes No Sign Here Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, Only If You Are Filing This Form correct, and complete. Declaration of preparer (other than general partner or limited liability company member) is based on all information of which preparer has any knowledge. Separately and Not With Your Tax Signature of general partner or limited liability company member Return. Print/Type preparer's name reparer's signature Paid Preparer LYNNE M. HUISMANN P00053811 Use Firm's name ▶PLANTE & MORAN, PLLC Firm's EIN 38-1357951 Only Firm's address ▶2601 CAMBRIDGE CT., SUITE Phone no. AUBURN HILLS, MI 48326 248-375-7100

Form 8865 (2014)

	m 8865 (201		E S. FISHER FOUN					<u>-1784</u>	340	Page 2
Sc	hedule A	Constructive Ownership of Partnershi		=	-					
		address, and U.S. taxpayer identifying	number (if any) of the person(s) who	<u>se interest</u>	t you constru	ctively own. See	e instru	ctions.		
		a X Owns a direct interest	b	Own	s a construct	ve interest				
		Name	Address			Identifying	number:	(if any i)	Check if foreign	Check if direct
		Name	Address			identilying	number	(ii any)	person	partner
_										
									<u> </u>	
202-30			<u> </u>						<u> </u>	
Sc	hedule A-1	Certain Partners of Foreign Partnersh	nip (see instructions)							T 2:
		Name	Address			Identii	fvina nur	nber (if any)		Check if foreign
_							,,			person
						 .				
										ļ
_										
Dog	o the partner	chin have any other foreign person as a di	root northor?	·				Vac		I
200	hedule A-2	ship have any other foreign person as a di Affiliation Schedule. List all partnersh						Yes		_ No
00	ileuule A-2	indirectly owns a 10% interest.	ips (totetgit of domestic) in which the	i ioreigir p	armership ov	ins a direct inte	restor			
		munectly owns a 10 % interest						-		Check
		Name	Address			EIN (if any)			ordinary e or loss	Check i foreign partner
	TATEM	ENT 28								ship
							$\neg \neg$			
Sc	hedule B	Income Statement - Trade or Busines	s Income							
Cau	tion. Include	only trade or business income and expens		the instru	uctions for me	ore information				
				T						
	1 a Gross	receipts or sales		1a						
		eturns and allowances		1b			1c			
							2		,	
ae L	3 Gross	profit. Subtract line 2 from line 1c					3			
Income	4 Ordina	ry income (loss) from other partnerships, (estates, and trusts (attach statement)			•••••	4			
드		m profit (loss) (attach Schedule F (Form 10					5			
	6 Net ga	in (loss) from Form 4797, Part II, line 17 (a	attach Form 4797)				6			
	7 Other i	ncome (loss) (attach statement)					7			
	8 Total	ncome (loss). Combine lines 3 through 7					8			
		s and wages (other than to partners) (less					9			
	10 Guarai	nteed payments to partners				•••••	10			
ls)	11 Repair	s and maintenance					11			
ifatio	12 Bad de	***************************************					12			
for III	13 Rent					• • • • • • • • • • • • • • • • • • • •	13			
tions		and licenses					14			
ıstruc		t					15			
See ir		iation (if required, attach Form 4562)					17. 41.			
SE		epreciation reported elsewhere on return					16c			
cţi	17 Deplet	on (Do not deduct oil and gas depletion.)					17			
Deductions (see instructions for limitations)		nent plans, etc.		•••••		•••••	18			
۵	19 Emplo	yee benefit programs		•••••			19			
	20 Other	deductions (attach statement)					20			
	21 Total	leductions. Add the amounts chown in the	for right polymo for lines 0 through 0	20			,			
	10141	leductions. Add the amounts shown in the	iai rigin commin ioi mies 9 miodyli 2	.υ			21			
	22 Ordina	ry business income (loss) from trade or b	usiness activities. Subtract line 21 fro	m line Q			22			
4106	52		Comood Convinces. Oubliget fille 2 I IIU	an mie o			22		Form 904	SE (2014)
11-1	3-14								Form 886	วง (20 14)

SCHEDULE 0 (Form 8865)

Transfer of Property to a Foreign Partnership (under section 6038B)

Attach to Form 8865. See Instructions for Form 8865.

OMB No. 1545-1668

Department of the Treasury Internal Revenue Service

Name of transferor

Information about Schedule 0 (Form 8865) and its separate instructions is at www.lrs.gov/form8865. MAX M. & MARJORIE S. FISHER FOUNDATION,

Filer's identifying number

INC. 38-1784340 TRIDENT V, LP Name of foreign partnership EIN (if any) Reference ID number (see instr) C/O STONE POINT CAPITAL, LLC 98-0613069

Type of property	(a) Date of transfer	(b) Number of items transferred	(c) Fair market value on date of transfer	Cost	(d) or other asis	(e) Section 704(c) allocation method	(f) Gain recognized on transfer	(g) Percentage interest in partnership after transfer
Cash	Ω.		641,65	6.				.098142
Stock, notes eceivable and payable, and other eccurities								
nventory								
angible property used in trade or business								
ntangible property								
Other roperty								
Supplemental	Information R	equired To Be	Reported (see ins	tructions):				
Part II	Dispositions	Reportable Ur	nder Section 6038	В				
(a) Type of property	۰	(b) Pate of riginal ansfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

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

Schedule 0 (Form 8865) 2014

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

Attach to your tax return.

beginning JAN 1

Information about Form 8865 and its separate instructions is at www.irs.gov/form8865
Information furnished for the foreign partnership's tax year

, 2014, and ending DEC

OMB No. 1545-1668

Attachment Sequence No. 118

2014

Department of the Treasury Internal Revenue Service

Name of person filing this return Filer's identifying number 38-1784340 MAX M. & MARJORIE S. FISHER FOUNDATION, INC. Filer's address (if you are not filing this form with your tax return) A Category of filer (see Categories of Filers in the instructions and check applicable box(es)): 3 X 2 | 1 2014, and ending JAN B beginning DEC C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$ If filer is a member of a consolidated group but not the parent, enter the following information about the parent Name EIN Address Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identifying number Category 1 Category 2 Constructive ow F1 Name and address of foreign partnership 2(a) EIN (if any) TRIDENT VI, LP 2(b) Reference ID number TRIDENTVILP TWO TOWNE SQUARE, SUITE 900 3 Country under whose laws organized SOUTHFIELD ΜI 48076 CAYMAN ISLANDS 4 Date of 5 Principal place 6 Principal business 7 Principal business 8a Functional 8b Exchange rate organization of business activity code number activity currency (see instr.) 07/18/2013CONNECTICUT 523900 INVESTMENTS US DOLLAR G Provide the following information for the foreign partnership's tax year: 2 Check if the foreign partnership must file: 1 Name, address, and identifying number of agent (if any) in the United States X Form 1065 or 1065-B Form 1042 Form 8804 Service Center where Form 1065 or 1065-B is filed: OGDEN, A Name and address of person(s) with custody of the books and records partnership, and the location of such books and records, if different 3 Name and address of foreign partnership's agent in country of organization, if any Were any special allocations made by the foreign partnership? X No Yes Enter the no. of Forms 8858, Info Return of U.S. Persons With Respect To Foreign Disregarded Entities, attached to this return How is this partnership classified under the law of the country in which it is organized? 8a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that is a separate unit under Reg. 1.1503(d)-1(b)(4) or part of a combined separate unit under Reg. 1.1503(d)-1(b)(4)(ii)? If "No," skip question 8b. X No Yes If "Yes," does the separate unit or combined separate unit have a dual consolidated loss as defined in Reg. 1.1503(d)-1(b)(5)(ii)? Does this partnership meet both of the following requirements? The partnership's total receipts for the tax year were less than \$250,000 and
 The value of the partnership's total assets at the end of the tax year was less than \$1 million. _ No 」Yes If "Yes," do not complete Schedules L, M-1, and M-2. Sign Here Only If You Are Filing This Form Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true correct, and complete. Declaration of preparer (other than general partner or limited liability company member) is based on all information of which preparer has any knowledge Separately and Not With Your Tax Return. Signature of general partner or limited liability company member Print/Type preparer's name Preparer's signature Date Check Paid self-employed Preparer LYNNE M. HUISMANN P00053811 Use Firm's name PLANTE & MORAN, PLLC Firm's EIN 38-1357951 Only Firm's address ≥2601 CAMBRIDGE CT., SUITE Phone no. AUBURN HILLS, MI 48326 248-375-7100 LHA For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

	hedule A	Constructive Ownership of Partnershi		to the	filer. If you ch		the nai	-	340	Page Z
		address, and U.S. taxpayer identifying a	number (if any) of the person(s) whos b	_	est you consti vns a constru	-	e instru	ictions.		
	 -	a Owns a direct interest	Address	<u> </u>	vns a constru	Identifying	number	(if any)	Check if foreign	Check if direct
						,,		···	person	partner
						 			<u> </u>	
										
						+				
						 				
Sc	hedule A-1	Certain Partners of Foreign Partnersh	ip (see instructions)			-			·	<u> </u>
										Check if foreign
_		Name	Address			Identi	tying nui	mber (if any)		person
_						-				
_										<u> </u>
Doo	e the partn	orchin have any other foreign norcon as a dir	oot partner?			<u> </u>		Yes		I No
	hedule A-2	ership have any other foreign person as a dir Affiliation Schedule. List all partnershi								No
00	iouulo A-2	indirectly owns a 10% interest.	ps (foreign of doffiestic) in which the	ioi cigii	i partiici siiip	JWIIS & UII CCI III C	1691 OI			
						EIN		Total o	rdinary	Check foreign partner
		Name	Address			(if any)			or loss	partner
S	TATE	MENT 29							-	
						ļ				
						ļ				
la:	er mander en					<u> </u>				
	hedule B	Income Statement - Trade or Busines		the ine	turnetiana farr					
Cau	uon. mesa	de only trade or business income and expens	es off files Ta tiffough 22 below. See	ine ins	Tuctions for	nore mormation	11/2	Γ		
	l 1a Gros	s receipts or sales		1a	60					
		returns and allowances		1b			1c			
				NO CONTRACTOR	Cold Manager		2			
e e	3 Gros	s profit. Subtract line 2 from line 1c					3			
Income	4 Ordii	nary income (loss) from other partnerships, ϵ	estates, and trusts (attach statement)			***************************************	4			
드		arm profit (loss) (attach Schedule F (Form 10					5			
	6 Net g	pain (loss) from Form 4797, Part II, line 17 (a	ttach Form 4797)				6			
	7 Othe	r income (loss) (attach statement)					7			
	O Tota	Lincome (Jace), Combine lines 2 through 7								
	8 Tota 9 Salai	l income (loss). Combine lines 3 through 7 ies and wages (other than to partners) (less	amployment credite)			G	8			
		anteed payments to partners					10			
		irs and maintenance					11			
fions)						CONTRACTOR AND AND AND AND AND AND AND AND AND AND	12			
記	13 Rent						13		···································	
ins fo		s and licenses					14			
tractic	15 Inter	est		· · · · · ·			15			
see ins		eciation (if required, attach Form 4562)					1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1			
ns (s		depreciation reported elsewhere on return					16c			
Deductions (see instructions for limitations)		etion (Do not deduct oil and gas depletion.)					17			
ğ		ement plans, etc.					18			
۵	19 Emp 20 Othe	oyee benefit programs					19 20			
	Le Ouie	r deductions (attach statement)		*********			20			
	21 Tota	I deductions. Add the amounts shown in the	far right column for lines 9 through 20)			21			
		nary business income (loss) from trade or b	usiness activities. Subtract line 21 fror	n line 8	<u></u>	<u></u>	22			
4108 11-1	52								Form 886	55 (2014)

SCHEDULE 0 (Form 8865)

Transfer of Property to a Foreign Partnership (under section 6038B)

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

OMB No. 1545-1668

Department of the Treasury Internal Revenue Service

Name of transferor

▶ Information about Schedule O (Form 8865) and its separate instructions is at www.irs.gov/form8865 MAX M. & MARJORIE S. FISHER FOUNDATION, INC.

Filer's identifying number 38-1784340

TRIDENT VI, LP Name of foreign partnership EIN (if any) Reference ID number (see instr) TRIDENTVILP Part I Transfers Reportable Under Section 6038B (e) Section 704(c) (f) Gain (g) Type of Date of Fair market Number of Cost or other Percentage interest property value on date transfer items basis allocation recognized on in partnership after transferred of transfer method 193,238 .0165538% Cash Stock, notes receivable and payable, and other securities Inventory Tangible property used in trade or business Intangible property Other property Supplemental Information Required To Be Reported (see instructions): Part II Dispositions Reportable Under Section 6038B (d) (f) Depreciation (g) Type of Date of Date of Gain Gain allocated Depreciation recapture recognized by partnership property original disposition disposition recognized by to partner recapture allocated transfer partnership to partner

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

_ Yes Schedule O (Form 8865) 2014

Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)?

FORM 8865	AFFILIATION SCHEDULE		STATEMEN	т 28
NAME	ADDRESS	IDENTIFYING NUMBER	TOTAL ORDINARY INCOME OR (LOSS)	EIGN
FREEPOINT COMMODITIES	58 COMMERCE RD	35-2437780		
TRIDENT SKY PL HOLDINGS	STAMFORD, CT 06902 20 HORSENECK LN	45-2923453		
TRIDENT FP HOLDINGS	GREENWHICH, CT 06830 20 HORSENECK LN GREENWHICH, CT 06830	98-0613069		
TRIDENT EP-II HOLDINGS	20 HORSENECK LN	46-1489351		
TRIDENT MA HOLDINGS	GREENWHICH, CT 06830 20 HORSENECK LN	46-1005148		
TRIDENT V DP HOLDINGS LP	GREENWHICH, CT 06830 20 HORSENECK LN	90-1023717		
TRIDENT LANCASTER HOLDINGS	GREENWHICH, CT 06830 20 HORSENECK LN	46-3120356		
SKY HARBOR CAPITAL HOLDING	GREENWHICH, CT 06830 20 HORSENECK LN	45-3058471		
NXT CAPITAL GP, LLC	GREENWHICH, CT 06830 191 NORTH WACKER DRIVE CHICAGO, IL 60606	27-2818382	9	
FORM 8865	AFFILIATION SCHEDULE		STATEMEN	т 29
		IDENTIFYING	TOTAL ORDINARY INCOME	CK IF FOR- EIGN
NAME	ADDRESS	NUMBER	OR (LOSS)	
TRIDENT OMNI HOLDINGS, LLC	20 HORSENECK LN	47-2323129		
TRIDENT OMNI DEL-I LP	GREENWHICH, CT 06830 20 HORSENECK LN	47-2807734		
TRIDENT OMNI DEL-II LP	GREENWHICH, CT 06830 20 HORSENECK LN	47-2813860		
OASIS OUTSOURCING GROUP LP	GREENWHICH, CT 06830 2054 VISTA PARKWAY #300	30-0846265		
ONCOL H	WEST PALM BEACH , FL 3341			

LP

HOME POINT CAPITAL 1194 OAK VALLEY DR, STE 80 47-1776338

ANN ARBOR, MI 48108

(Rev. December 2013) Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB No. 1545-0028

Attachment Sequence No. 128

Pa	rt U.S. Transferor Information (see instructions)				
Name of transferor			Identifying number (see instructions)		
MAX M. & MARJORIE S. FISHER FOUNDATION,					
INC.			38-1784340		
1 If the transferor was a corporation, complete questions 1a through 1d.					
а	a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 or				
_	fewer domestic corporations?				
h	b Did the transferor remain in existence after the transfer?			□ No	
D				□ NO	
	If not, list the controlling shareholder(s) and their identifying number(s):				
	Controlling shareholder Ide		ntifying number		
	<u> </u>				
C	If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporati	on?	Yes	No	
If not, list the name and employer identification number (EIN) of the parent corporation:					
	Thot, list the hard employer destineation named (Env) of the parent corporation.				
	Name of parent corporation	EIN of	parent corporation	n	
				T 1	
a	Have basis adjustments under section 367(a)(5) been made?		Yes	L No	
_		_			
2	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such unc	ler secti	on 367), complete	Э	
	questions 2a through 2d.				
а	List the name and EIN of the transferor's partnership:				
	Name of partnership	EIN of partnership			
	Traine of paration of paraticles	Ent of parti			
b	Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No	
С	Is the partner disposing of its entire interest in the partnership?		Yes	X No	
	Is the partner disposing of an interest in a limited partnership that is regularly traded on an established				
	securities market?		Yes	X No	
Pa	rt II Transferee Foreign Corporation Information (see instructions)				
3	Name of transferee (foreign corporation)	4a l	dentifying numbe	r. if any	
				.,	
BI	REP VII ALBERTA FEEDER (OFFSHORE) F-NQ LP	98	-1020150		
		+	Reference ID numb	or .	
345 PARK AVENUE		י שר	iererence ib nami	CI	
	NEW YORK, NY 10154				
6	Country code of country of incorporation or organization				
_C2					
7	Foreign law characterization (see instructions)				
_PZ	ARTNERSHIP			T == 1	
8	Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No	
LHA	For Paperwork Reduction Act Notice, see separate instructions.		Form 926 (R	ev. 12-2013)	
42453 05-01-					

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash			123,738.		
Stock and					
securities					
Installment obligations,					
account receivables or					
similar property					
Foreign currency or other					
property denominated in					
foreign currency					
Inventory					
·					
Ţ					
Assets subject to					
depreciation recapture					
(see Temp. Regs. sec.					
1.367(a)-4T(b))	· = 1				<u> </u>
Tangible property used in					
trade or business not listed					
under another category					
Intangible			M.		
property					
,					
Property to be leased					
(as described in final					
and temp. Regs. sec.					
1.367(a)-4(c))					
Property to be sold					
(as described in					
Temp. Regs. sec.					
1.367(a)-4T(d))					
Transfers of oil and gas					
working interests (as					
described in Temp.					
Regs. sec. 1.367(a)-4T(e))					
negs. sec. 1.507(a)-41(e))					
Other preparty					
Other property					
Supplemental Informa	tion Required	To Be Reported (see in	structions):		

•	 	 	

CASH TRANSFERS OCCURRED ON VARIOUS DATES DURING THE YEAR ENDED 12/31/2014.

Part IV Additional Information Regarding Transfer of Property (see instructions) Part Iversity Additional Information Regarding Transfer of Property (see instructions) Part Iversity Reference 10437 % (b) After .0429 %			3-1784340	Page 3
(a) Before0437_% (b) After0429_% 10 Type of nonrecognition transaction (see instructions) ▶ SECTION 351 11 Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3)	Pai			
10 Type of nonrecognition transaction (see instructions) ▶ SECTION 351 11 Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3)	9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:		
10 Type of nonrecognition transaction (see instructions) ▶ SECTION 351 11 Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3)		(a) Before • 0437 % (b) After • 0429 %		
Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(h)(3)				
a Gain recognition under section 904(f)(3)	10	Type of nonrecognition transaction (see instructions) ▶ SECTION 351	-	
b Gain recognition under section 904(f)(5)(F)				
c Recapture under section 1503(d)	а	Gain recognition under section 904(f)(3)		
d Exchange gain under section 987	b			
Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes X No Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following: Tainted property Yes X No Depreciation recapture Pes X No Any other income recognition provision contained in the above-referenced regulations Yes X No Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes X No 15 a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)? Yes X No b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred Yes X No No 16 Was cash the only property transferred? X Yes No b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the	С		· —	
Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following: a Tainted property	d	Exchange gain under section 987	Yes	X No
1.367(a)-4 through 1.367(a)-6 for any of the following: a Tainted property	12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	. Yes	X No
a Tainted property	13	Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections		
b Depreciation recapture				
b Depreciation recapture	а	Tainted property	Yes	X No
c Branch loss recapture				X No
d Any other income recognition provision contained in the above-referenced regulations Yes X No 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes X No 15 a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)·1T(d)(5)(iii)? Yes X No b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred \$\Bigs\\$ Mo 16 Was cash the only property transferred? X Yes No 17 a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction? Yes X No b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the	С		[X No
15 a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)? □ Yes ☒ No b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$ □ 16 Was cash the only property transferred? □ X Yes □ No 17 a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction? □ Yes ☒ No b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the	d	Any other income recognition provision contained in the above-referenced regulations	. Tyes	X No
1.367(a)·1T(d)(5)(iii)?	14	Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?	Yes	X No
b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$	15 a	Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section		
transferred ▶ \$		1.367(a)-1T(d)(5)(iii)?	Yes	X No
transferred ▶ \$	b	If the answer to line 15a is "Yes." enter the amount of foreign goodwill or going concern value		
17 a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction? Yes				
b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the	16	Was cash the only property transferred?	X Yes	□ No
b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the	17 a	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?	Yes	X No
transaction:	b			
		transaction:		

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB No. 1545-0026

Part 1 U.S. Transferor information (see instructions)	
Name of transferor	Identifying number (see instructions)
MAX M. & MARJORIE S. FISHER FOUNDATION,	
INC.	38-1784340
1 If the transferor was a corporation, complete questions 1a through 1d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 or
fewer domestic corporations?	Yes No
b Did the transferor remain in existence after the transfer?	Yes No
If not, list the controlling shareholder(s) and their identifying number(s):	
Controlling shareholder	Identifying number
Oont oming shall enough	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent could like the name and employer identification number (EIN) of the parent corporation:	prporation? Yes No
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(5) been made?	Yes No
2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as su	uch under section 367), complete
questions 2a through 2d.	
a List the name and EIN of the transferor's partnership:	
Name of partnership	EIN of partnership
SIGULER GUFF DISTRESSED OPPORTUNITIES FUND III, LP 2	061412407
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	
c Is the partner disposing of its entire interest in the partnership?	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establish securities market?	
Part II Transferee Foreign Corporation Information (see instructions)	Yes X No
3 Name of transferee (foreign corporation)	4a Identifying number, if any
PARK LUXCO 2 S.A.R.L.	98-1205405
5 Address (including country)	4b Reference ID number
25C, BOULEVARD ROYAL	To the second to the manual
MUNSBACH, L-2449 LUXEMBOURG	
6 Country code of country of incorporation or organization	
LU	
7 Foreign law characterization (see instructions)	
CORPORATION	
8 Is the transferee foreign corporation a controlled foreign corporation?	X Yes No
LHA For Paperwork Reduction Act Notice, see separate instructions.	Form 926 (Rev. 12-2013)
424531 05-01-14	22010)

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash					
Stock and securities					
Installment obligations, account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b)) Tangible property used in trade or business not listed under another category	12/12/2014	PROPERTY	527.		
Intangible property					
Property to be leased (as described in final and temp. Regs. sec. 1.367(a)-4(c))					
Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d))					
Transfers of oil and gas working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e))					
Other property					
Supplemental Inform	ation Required	To Be Reported (see inst	ructions):		

	1926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38	<u>-1784340</u>	Page 3
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:		
	(a) Before1884 % (b) After3957 %		
10	Type of nonrecognition transaction (see instructions) ▶ SECTION 351		
11	Indicate whether any transfer reported in Part III is subject to any of the following:		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)		X No
d	Exchange gain under section 987	Yes	X No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	Yes	X No
13	Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections		
	1.367(a)-4 through 1.367(a)-6 for any of the following:		
	Tainted property	Yes	X No
b			X No
	Depreciation recapture		X No
C	Branch loss recapture	Yes	
d	Any other income recognition provision contained in the above-referenced regulations	└── Yes	X No
14	Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?	Yes	X No
15 a	Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?	Yes	X No
b	If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$		
16	Was cash the only property transferred?	Yes	X No
17 a	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?	Yes	X No
b	If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:		
		Form 926 (P	lev. 12-2013)

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor			Identifying number (see instructions)
MAX M. & MARJORIE S. FISHER FOUNDA	TION,		· ·
INC.			38-1784340
1 If the transferor was a corporation, complete questions 1a throu	gh 1d.		
a If the transfer was a section 361(a) or (b) transfer, was the transf	eror controlled (under section 368	(c)) by 5 or	
fewer domestic corporations?			Yes No
b Did the transferor remain in existence after the transfer?			Yes No
If not, list the controlling shareholder(s) and their identifying num	ber(s):		
Controlling shareholder	T		Identifying number
			identifying number
	ri.		
c If the transferor was a member of an affiliated group filing a cons	· · · · · · · · · · · · · · · · · · ·	corporation?	Yes No
If not, list the name and employer identification number (EIN) of	ne parent corporation:		
Name of parent corporation		EIN	of parent corporation
d Have basis adjustments under section 367(a)(5) been made?			Yes No
		•••••••	
2 If the transferor was a partner in a partnership that was the actu	al transferor (but is not treated as	such under s	section 367), complete
questions 2a through 2d.			
a List the name and EIN of the transferor's partnership:			
Name of partnership			EIN of partnership
Name of partnership			EIN OF partnership
AIF VII EURO HOLDINGS, LP		98-056	
b Did the partner pick up its pro rata share of gain on the transfer			
c Is the partner disposing of its entire interest in the partnership?			Yes X No
d Is the partner disposing of an interest in a limited partnership that			
securities market?			Yes X No
Part II Transferee Foreign Corporation Information	(see instructions)		
3 Name of transferee (foreign corporation)		4	la Identifying number, if any
AD MEN MOINMAIN MODDED GOODEDAMIES	773	ŀ	00 1126064
AP NEW MOUNTAIN TOPPER COOPERATIEF	UA		98-1126064
5 Address (including country)	OFFEE AAN 7	4	Ib Reference ID number
C/O ALTER DOMUS NEDERLAND B.V. DE B	OELELAAN /	1	
AMSTERDAM, 1083 HJ NETHERLANDS			
6 Country code of country of incorporation or organization			
NL			
7 Foreign law characterization (see instructions)			
NON-US PRIVATE LTD CO			V
8 Is the transferee foreign corporation a controlled foreign corpora			X Yes No
LHA For Paperwork Reduction Act Notice, see separate instruction 424531 05-01-14	uiis.		Form 926 (Rev. 12-2013)

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2

Part III	Informatio	n Regardii	ng Transfer	of Property	(see instructions)

Type of property	Date of transfer	Description of property	Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Cash		TOTAL SUPPLIES THE PROPERTY IN	$\Delta D_{\theta}^{(1)}$		
Stock and					
securities					
Installment obligations,					
account receivables or					
similar property					
Foreign currency or other					
property denominated in		ļ			
foreign currency					
Inventory					
Assets subject to					
depreciation recapture					
(see Temp. Regs. sec.					
1.367(a)-4T(b))					
Tangible property used in					
trade or business not listed					
under another category					
Intangible				10	
property					
Property to be leased					
(as described in final					
and temp. Regs. sec.					
1.367(a)-4(c))					
Property to be sold					
(as described in					
Temp. Regs. sec.					
1.367(a)-4T(d))					
Transfers of oil and gas			- 3		
working interests (as			8		
described in Temp.					
Regs. sec. 1.367(a)-4T(e))	 	DDODEDWA	105 250	05 201	
	02/21/2014	FULTI	105,259.	95,301.	
Other property					
	1				
Supplemental Information Required To Be Reported (see instructions):					
		2000 - 1000 C			

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor	Identifying number (see instructions)		
MAX M. & MARJORIE S. FISHER FOUNDATION,	, , , , , , , , , , , , , , , , , , , ,		
INC.	38-1784340		
1 If the transferor was a corporation, complete questions 1a through 1d.			
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 or			
fewer domestic corporations?	Yes No		
b Did the transferor remain in existence after the transfer?	Yes No		
If not, list the controlling shareholder(s) and their identifying number(s):			
Controlling shareholder	dentifying number		
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?	Yes No		
If not, list the name and employer identification number (EIN) of the parent corporation:			
Name of parent corporation EIN	of parent corporation		
d Have basis adjustments under section 367(a)(5) been made?	Yes No		
2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under s	ection 367), complete		
questions 2a through 2d.			
a List the name and EIN of the transferor's partnership:			
Name of partnership	EIN of partnership		
	Life of partitorship		
110 HTT 0000 HOLDINGS ID	4000		
AIF VII EURO HOLDINGS, LP 98-0564			
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			
c Is the partner disposing of its entire interest in the partnership?	Yes X No		
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established			
securities market?	Yes X No		
Part II Transferee Foreign Corporation Information (see instructions)			
3 Name of transferee (foreign corporation) 48	a Identifying number, if any		
WENT TO THE WATER THE STATE OF THE			
	98-1187284		
	Reference ID number		
MEDIARENA 1			
AMSTERDAM-DUIVENDRECHT, 1114 BC NETHERLANDS			
6 Country code of country of incorporation or organization			
NL			
7 Foreign law characterization (see instructions)			
NON-US PRIVATE LTD CO			
8 Is the transferee foreign corporation a controlled foreign corporation?	X Yes No		
LHA For Paperwork Reduction Act Notice, see separate instructions.	Form 926 (Rev. 12-2013)		
72-03-14			

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash					
Stock and securities					
Installment obligations, account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b))					
Tangible property used in trade or business not listed under another category					
Intangible property					
Property to be leased (as described in final and temp. Regs. sec. 1.367(a)-4(c))					
Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d))					
Transfers of oil and gas working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e))					
Other property	08/22/2014 08/22/2014	PROPERTY PROPERTY	105,259.	95,301. 32,983.	
Supplemental Inform	ation Required	To Be Reported (see i	nstructions):		
					10000

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
MAX M. & MARJORIE S. FISHER FOUNDATION,	
INC.	38-1784340
1 If the transferor was a corporation, complete questions 1a through 1d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by	
fewer domestic corporations?	Yes No
b Did the transferor remain in existence after the transfer?	Yes L No
If not, list the controlling shareholder(s) and their identifying number(s):	
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporate	ration? Yes No
If not, list the name and employer identification number (EIN) of the parent corporation:	
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(5) been made?	Yes No
O If the transferor was a nector in a partnership that was the net validation of transferor (but is not transfer as a such	under cention 207) - complete
2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such questions 2a through 2d.	under section 567), complete
a List the name and EIN of the transferor's partnership:	
Name of partnership	EIN of partnership
	-0564028
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	
c Is the partner disposing of its entire interest in the partnership?	Yes X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	
securities market?	Yes X No
Part II Transferee Foreign Corporation Information (see instructions)	
3 Name of transferee (foreign corporation)	4a Identifying number, if any
AP NMT JV NEWCO	
5 Address (including country)	4b Reference ID number
MEDIARENA 1	
AMSTERDAM-DUIVENDRECHT, 1114 BC NETHERLANDS	APNMTJVNEWCO
6 Country code of country of incorporation or organization NL	
7 Foreign law characterization (see instructions)	
NON-US PRIVATE LTD CO	
8 Is the transferee foreign corporation a controlled foreign corporation?	X Yes No
LHA For Paperwork Reduction Act Notice, see separate instructions.	Form 926 (Rev. 12-2013)
42493 05-01-14	

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash					
Stock and					
securities					
Installment obligations,					
account receivables or					
similar property					
				<u> </u>	
Foreign currency or other					
property denominated in					
foreign currency					
Inventory					
				·	
Assets subject to					
depreciation recapture					
(see Temp. Regs. sec.					
1.367(a)-4T(b))					
Tangible property used in					
trade or business not listed	,				
under another category					
Intangible					*.
property					
Property to be leased					
(as described in final			/		
and temp. Regs. sec.					
1.367(a)-4(c))					
Property to be sold					
(as described in					
Temp. Regs. sec.					
1.367(a)-4T(d))					
Transfers of oil and gas					
working interests (as	*				
described in Temp.					
Regs. sec. 1.367(a)-4T(e))	10/10/0014		100 100	456 446	
	12/12/2014	PROPERTY	186,406.	176,448.	
Other property					
	<u> </u>				
Supplemental Inform	ation Required	To Be Reported (see in	nstructions):		
			· · · · · · · · · · · · · · · · · · ·		
0000 Wo		THE SECRET CONTRACTOR OF THE SECRET			
(200 A 200 E2)					
		1,000			

	926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38	-1784340	Page 3
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:		
	(a) Before % (b) After %		
10	Type of nonrecognition transaction (see instructions) ▶ SECTION 351		
11	Indicate whether any transfer reported in Part III is subject to any of the following:		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d		Yes	X No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	Yes	X No
13	Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections		
	1.367(a)-4 through 1.367(a)-6 for any of the following:		
а	Tainted property	Yes	X No
b	Depreciation recapture		X No
C	Branch loss recapture		X No
d	Any other income recognition provision contained in the above-referenced regulations		X No
14	Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?	Yes	X No
15 a	Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?	Yes	X No
b	If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$		
16	Was cash the only property transferred?	Yes	X No
17 a	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?	Yes	X No
b	If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:		
		Form 926 (F	Rev. 12-2013)

Return by a U.S. Transferor of Property

to a Foreign Corporation

Information about Form 926 and its separate instructions is at www.irs.gov/form926.

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	Coduction (C. 120
Name of transferor	Identifying number (see instructions)
MAX M. & MARJORIE S. FISHER FOUNDATION,	(see instructions)
INC.	38-1784340
If the transferor was a corporation, complete questions 1a through 1d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 or	
fewer domestic corporations?	Yes No
b Did the transferor remain in existence after the transfer?	Yes No
If not, list the controlling shareholder(s) and their identifying number(s):	
	Idealif in a control
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?	Yes No
If not, list the name and employer identification number (EIN) of the parent corporation:	
Name of parent corporation EIN	of parent corporation
(8):	
d Have basis adjustments under section 367(a)(5) been made?	Yes No
, , , , , , , , , , , , , , , , , , , ,	
2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under s	section 367), complete
questions 2a through 2d.	
a List the name and EIN of the transferor's partnership:	
Name of partnership	EIN of partnership
	•
AIF VIII EURO HOLDINGS, LP 98-114	3597
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	
c Is the partner disposing of its entire interest in the partnership?	······································
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	
securities market?	Yes X No
Part II Transferee Foreign Corporation Information (see instructions)	
3 Name of transferee (foreign corporation) 4	la Identifying number, if any
JUPITER MIDCO I INC	
5 Address (including country) SUITE 110, 585-8TH AVE. SW	Ib Reference ID number
	JUPITERMIDCOI
	OUPTIERMIDCOI
6 Country code of country of incorporation or organization CA	
7 Foreign law characterization (see instructions)	
CORPORATION	
8 Is the transferee foreign corporation a controlled foreign corporation?	Yes No
LHA For Paperwork Reduction Act Notice, see separate instructions.	Form 926 (Rev. 12-2013)
424531 05-01-14	

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash			147,212.		
Stock and					
securities					
Installment obligations,		·			
account receivables or					
similar property					
Foreign currency or other					
property denominated in					
foreign currency					
,					
Inventory				 	
-					
Assats subject to					
Assets subject to depreciation recapture					
(see Temp. Regs. sec.	,				
1.367(a)-4T(b))					
Tangible property used in					
trade or business not listed	;				
under another category					
and another eategory					
Intangible				25.9	
property					
Property to be leased					
(as described in final					
and temp. Regs. sec.					
1.367(a)-4(c))					
Property to be sold					
(as described in					
Temp. Regs. sec.					
1.367(a)-4T(d))			1		
Transfers of oil and gas					
working interests (as					
described in Temp.					
Regs. sec. 1.367(a)-4T(e))					
Other property	,				
L					
Supplemental Informa CASH TRANSFERS	tion Required	Fo Be Reported (see in	nstructions): TES DURING THE	YEAR ENDED	12/31/2014.

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)						
Name of transferor	Identifying numb	Identifying number (see instructions)				
MAX M. & MARJORIE S. FISHER FOUNDATION,						
INC.	38-1784	340				
1 If the transferor was a corporation, complete questions 1a through 1d.						
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368						
fewer domestic corporations?		Yes	∐ No			
b Did the transferor remain in existence after the transfer?		Yes	└─ No			
If not, list the controlling shareholder(s) and their identifying number(s):						
Controlling shareholder		dentifying number				
						
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent	corporation?	Yes	└─ No			
If not, list the name and employer identification number (EIN) of the parent corporation:						
Name of parent corporation	EIN	of parent corporati	on			
d Have basis adjustments under section 367(a)(5) been made?		Yes	□ No			
- \						
2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	such under s	ection 367), comple	te			
questions 2a through 2d.						
a List the name and EIN of the transferor's partnership:						
Name of partnership		EIN of partnership				
radito of partitol on p	'	Life of partite ship				
MACHINE CLO MADEMONGE EMPLO LD	00 112	71.00				
	98-113		137			
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			X No			
c Is the partner disposing of its entire interest in the partnership?			X No			
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establishment of the partner disposing of an interest in a limited partnership that is regularly traded on an establishment			X No			
securities market? Part II Transferee Foreign Corporation Information (see instructions)		Yes	A NO			
3 Name of transferee (foreign corporation)	4	a Identifying numb	or if any			
Name of transferee (foreign corporation)		a luciturying numb	er, ii ariy			
MAGNETITE XIV LIMITED						
5 Address (including country)	4	b Reference ID num	her			
P.O. BOX 1093, BOUNDARY HALL, CRICKET SWUARE		o moronoc io nam	001			
GRAND CAYMAN, KY1-1102 CAYMAN ISLANDS	1	MAGNETITEX:	ιν			
6 Country code of country of incorporation or organization						
CJ						
7 Foreign law characterization (see instructions)						
CORPORATION						
8 Is the transferee foreign corporation a controlled foreign corporation?		X Yes	□ No			
LHA For Paperwork Reduction Act Notice, see separate instructions.		Form 926 (f	Rev. 12-2013)			

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340

Part III Information Regarding Transfer of Property (see instructions) Page 2

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash			675,353.		
Stock and					
securities					
25					
Installment obligations,					
account receivables or					
similar property					
Foreign currency or other					
property denominated in					
foreign currency					
Inventory					
Assets subject to					
depreciation recapture					
(see Temp. Regs. sec.					
1.367(a)-4T(b))					
Tangible property used in					
trade or business not listed					
under another category					
	<u> </u>				
Intangible					
property					
Property to be leased					
(as described in final					
and temp. Regs. sec.					
1.367(a)-4(c))					
Property to be sold					
(as described in					
Temp. Regs. sec.					
1.367(a)-4T(d))					
Transfers of oil and gas	F 413				
working interests (as					
described in Temp.					
Regs. sec. 1.367(a)-4T(e))					
Other property					
Supplemental Informa	ation Required	To Be Reported (see inst	tructions):		
CASH TRANSFERS	OCCURRED	ON VARIOUS DATE	S DURING THE	YEAR ENDED	12/31/2014.

				_
Form	926	(Ray	12,2011	3١

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)				
Name of transferor MAX M. & MARJORIE S. FISHER FOUNDATION, INC.	i i	Identifying number (see instructions) $38-1784340$		
	1 20-1	704340		
was an action of the conference of the conferenc	20(4)) 5 5			
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 36		┌,	, 🗀	
fewer domestic corporations?		·······	Yes No	
b Did the transferor remain in existence after the transfer?	•••••	Ш	Yes L No	
If not, list the controlling shareholder(s) and their identifying number(s):				
Controlling shareholder		Identifying nu	mber	
			·· ·· ·· ·· ·· ··	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent front, list the name and employer identification number (EIN) of the parent corporation:	t corporation?		Yes No	
Name of parent corporation	EIN	of parent cor	poration	
d Have basis adjustments under section 367(a)(5) been made?			res No	
2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated a questions 2a through 2d.	s such under	section 367), c	omplete	
a List the name and EIN of the transferor's partnership:				
Name of partnership		EIN of partne	rship	
MAGNETITE CLO WAREHOUSE FUND, LP	98-113	7109		
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		닏`	res X No	
c Is the partner disposing of its entire interest in the partnership?		·	res X No	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estab	lished			
securities market?			res X No	
Part II Transferee Foreign Corporation Information (see instructions)				
3 Name of transferee (foreign corporation)	4	la Identifying	number, if any	
MAGNEITE XI LIMITED				
5 Address (including country)	4	lb Reference I	D number	
P.O. BOX 1093, BOUNDARY HALL, CRICKET SWUARE GRAND CAYMAN, KY1-1102 CAYMAN ISLANDS		MAGNEIT	EXI	
6 Country code of country of incorporation or organization CJ				
7 Foreign law characterization (see instructions)				
CORPORATION				
8 Is the transferee foreign corporation a controlled foreign corporation?		X	res No	
LHA For Paperwork Reduction Act Notice, see separate instructions. 424531 05-01-14			926 (Rev. 12-2013)	

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2 Part III Information Regarding Transfer of Property (see instructions) (c) (d) (e) Type of Date of Fair market value on Description of Cost or other Gain recognized on property transfer date of transfer transfer property basis 4,698,293. Cash Stock and securities Installment obligations, account receivables or similar property Foreign currency or other property denominated in foreign currency Inventory Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b)) Tangible property used in trade or business not listed under another category Intangible property Property to be leased (as described in final and temp. Regs. sec. 1.367(a)-4(c)) Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d)) Transfers of oil and gas working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e)) Other property Supplemental Information Required To Be Reported (see instructions):

CASH	TRANSFERS	OCCURRED	ON	VARIOUS	DATES	DOKTNG	THE	YEAR	ENDED	12/31/2014.	
										-	
											_
				R VIII							-
											_

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB No. 1545-0026

Pai	rt I U.S. Transferor Information (see instructions)		<u> </u>			
	e of transferor		lden	tifying numb	er (see instructions)	
	AX M. & MARJORIE S. FISHER FOUNDATION,					
II	NC.	38	<u>3-1784</u>	340		
1	If the transferor was a corporation, complete questions 1a through 1d.					
а	If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c))	-	,			
	fewer domestic corporations?		ļ	Yes	⊢ No	
b	Did the transferor remain in existence after the transfer?		اا	Yes	No No	
	If not, list the controlling shareholder(s) and their identifying number(s):					
	Controlling shareholder		Identifyir	ng number		
_	n					
				-		
					·····	
				120		
С	If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corp	oration	?	Yes	∟ No	
	If not, list the name and employer identification number (EIN) of the parent corporation:					
	Name of parent corporation	EI	N of parer	nt corporat	ion	
d	Have basis adjustments under section 367(a)(5) been made?			Yes	No	
2	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such	n under	section 36	67), comple	ete	
	questions 2a through 2d.					
а	List the name and EIN of the transferor's partnership:					
	Name of partnership		EIN of pa	artnership		
MA	AGNETITE CLO WAREHOUSE FUND, LP 98	-113	37109			
	Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			Yes	X No	
	Is the partner disposing of its entire interest in the partnership?			Yes	X No	
	Is the partner disposing of an interest in a limited partnership that is regularly traded on an established				•	
- 1	securities market?		<u></u> [Yes	X No	
Par	Transferee Foreign Corporation Information (see instructions)					
3	Name of transferee (foreign corporation)		4a Identii	fying numb	er, if any	
	AGNETITE IX LIMITED					
5 D (Address (including country) BOX 1093, BOUNDARY HALL, CRICKET SWUARE	- 1	4b Refere	nce ID num	nber	
	AND CAYMAN, KY1-1102 CAYMAN ISLANDS		MACNE	TITEI:	v	
			MAGNE	211151	<u> </u>	
6 CJ	Country code of country of incorporation or organization					
7	Foreign law characterization (see instructions)					
	DRPORATION					
8	Is the transferee foreign corporation a controlled foreign corporation?			X Yes	□ No	
LHA	For Paperwork Reduction Act Notice, see separate instructions.				Rev. 12-2013)	
424531 05-01-				\		

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash			1,921,814.		
Stock and securities					
Installment obligations, account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b)) Tangible property used in trade or business not listed under another category					
Intangible property					
Property to be leased (as described in final and temp. Regs. sec. 1.367(a)-4(c)) Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d)) Transfers of oil and gas					
working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e))					
Other property					
Supplemental Informa CASH TRANSFERS	ation Required	ITo Be Reported (s ON VARIOUS I	ee instructions): DATES DURING THE	YEAR ENDED	12/31/2014.

CASH	TRANSFERS	OCCURRED	ON	VARIOUS	DATES	DURING	THE	YEAR	ENDED	12/31/2014.	

	1926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-	1784340	Page 3
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:		
	(a) Before % (b) After %		
	(a) Delote		
10	Type of nonrecognition transaction (see instructions) ▶ SECTION 351		
11	Indicate whether any transfer reported in Part III is subject to any of the following:		
а	Gain recognition under section 904(f)(3)		X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	Yes	X No
13	Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections		
	1.367(a)-4 through 1.367(a)-6 for any of the following:		
а	Tainted property	Yes	X No
b	Depreciation recapture	Yes	X No
c	Branch loss recapture	Yes	X No
d	Any other income recognition provision contained in the above-referenced regulations	Yes	X No
14	Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?	Yes	X No
15 a	Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?	Yes	X No
b	If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$		
16	Was cash the only property transferred?	X Yes	☐ No
17 a	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?	Yes	X No
b	if "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:		

Return by a U.S. Transferor of Property

to a Foreign Corporation

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OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
MAX M. & MARJORIE S. FISHER FOUNDATION,	,
INC.	38-1784340
1 If the transferor was a corporation, complete questions 1a through 1d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by	5 or
fewer domestic corporations?	
b Did the transferor remain in existence after the transfer?	Yes No
If not, list the controlling shareholder(s) and their identifying number(s):	
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corpora	ation? Yes No
If not, list the name and employer identification number (EIN) of the parent corporation:	
Name of account account in	PIN 4
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(5) been made?	Yes No
2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such u	nder section 367), complete
questions 2a through 2d.	
a List the name and EIN of the transferor's partnership:	
Name of partnership	EIN of partnership
Hairie of partite ship	Ent of partnership
· · · · · · · · · · · · · · · · ·	0413219
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	
c Is the partner disposing of its entire interest in the partnership?	Yes X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	·
securities market?	Yes X No
Part II Transferee Foreign Corporation Information (see instructions)	
3 Name of transferee (foreign corporation)	4a Identifying number, if any
M&G REAL ESTATE DEBT FUND II FEEDER LP	98-1069347
5 Address (including country)	4b Reference ID number
LA PLAIDERIE CHAMBERS 3RD FL., LA PLAIDERIE ST PETER PO	R
CHANNEL ISLANDS, GY11WG GUERNSEY	
6 Country code of country of incorporation or organization	
GK	
7 Foreign law characterization (see instructions)	
LIMITED PARTNERSHIP	
8 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
LHA For Paperwork Reduction Act Notice, see separate instructions.	Form 926 (Rev. 12-2013)
424531 05-01-14	•

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2

Part III Information Regarding Transfer of Property (see instructions)

Cash	 Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized or transfer
		474,596.		
1				
Stock and				
securities				
nstallment obligations,				
account receivables or				
similar property	 			
Foreign currency or other				
property denominated in				
oreign currency	 			
nventory	 			
,	 			
Assets subject to				
depreciation recapture				
see Temp. Regs. sec.				
1.367(a)-4T(b))				
Tangible property used in	 			
rade or business not listed				
under another category				
ander another category	 			
ntangible	 			
property	 			
Property to be leased	 			
as described in final				
and temp. Regs. sec.				
1.367(a)-4(c))	 			
Property to be sold	 			
as described in				
Temp. Regs. sec.	 			
.367(a)-4T(d))	 			
ransfers of oil and gas				
vorking interests (as				
lescribed in Temp.	 			
Regs. sec. 1.367(a)-4T(e))				
Other property				

Return by a U.S. Transferor of Property

to a Foreign Corporation

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OMB No. 1545-0026

	rt I U.S. Transferor Information (see instructions)					
Name of transferor				Identifying number (see instructio		
MAX M. & MARJORIE S. FISHER FOUNDATION,						
INC.				7843	340	
1	If the transferor was a corporation, complete questions 1a through 1d.					
а	If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5	or				
	fewer domestic corporations?			Yes	☐ No	
b	Did the transferor remain in existence after the transfer?			Yes	☐ No	
	If not, list the controlling shareholder(s) and their identifying number(s):					
						
	Controlling shareholder	Identif	ying nu	mber		
	J II					
	If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporat	ion?		Yes	No	
	If not, list the name and employer identification number (EIN) of the parent corporation:					
	Name of parent corporation	EIN of par	ent cor	poration	on	
d	Have basis adjustments under section 367(a)(5) been made?			Yes	□ No	
d	Have basis adjustments under section 367(a)(5) been made?			Yes	□ No	
d 2	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un			77 11		
				77 11		
2	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un			77 11		
2	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership:	der section	367), c	complet		
2	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d.	der section		complet		
2 a	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership	der section	367), c	complet		
a AC	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP 90-0	der section EIN of	367), c	complet	e	
2 a AC b	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	EIN of	367), c	rship	e X No	
a AC b c	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership?	EIN of	367), c	complet	e	
a AC b c	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	EIN of	367), c	rship Yes	e X No X No	
a AC b c d	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?	EIN of	367), c	rship	e X No	
a AC b c d	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions)	EIN of	367), c	rship Yes Yes	X No X No	
a AC b c d	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?	EIN of	367), c	rship Yes Yes	e X No X No	
a AC b c d	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? It II Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation)	EIN of	367), c	rship Yes Yes	X No X No	
a AC b c d	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? TII Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation)	EIN of	partne	rship Yes Yes Yes	X No X No X No er, if any	
a AC b c d Par 3 EN	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? It I Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) NDEAVOUR ACQUISITION UK LIMITED Address (including country)	EIN of	partne	rship Yes Yes Yes	X No X No X No er, if any	
AC b c d Par 3 EN 5	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? IT I Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) NDEAVOUR ACQUISITION UK LIMITED Address (including country) ERSHEDS HOUSE, 70 GREAT BRIDGEWATER ST	EIN of 786859	partner	rship Yes Yes numbe	X No X No X No Pr, if any	
AC b c d Par 3 EN 5 EVE	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? IT I Transferee Foreign Corporation Information (see instructions) NDEAVOUR ACQUISITION UK LIMITED Address (including country) ERSHEDS HOUSE, 70 GREAT BRIDGEWATER ST NCHESTER, MI 5ES UNITED KINGDOM	EIN of 786859	partner	rship Yes Yes numbe	X No X No X No er, if any	
AC b c d Par 3 EVE MAN 6	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP 90-0 Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? IT Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) NDEAVOUR ACQUISITION UK LIMITED Address (including country) ERSHEDS HOUSE, 70 GREAT BRIDGEWATER ST NCHESTER, MI 5ES UNITED KINGDOM Country code of country of incorporation or organization	EIN of 786859	partner	rship Yes Yes numbe	X No X No X No Pr, if any	
AC b c d Par 3 EN 5 EVE MAN 6 UK	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP 90-0 Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? ITransferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) NDEAVOUR ACQUISITION UK LIMITED Address (including country) ERSHEDS HOUSE, 70 GREAT BRIDGEWATER ST NCHESTER, MI 5ES UNITED KINGDOM Country code of country of incorporation or organization	EIN of 786859	partner	rship Yes Yes numbe	X No X No X No Pr, if any	
AC b c d Par 3 EN 5 EVE MAN 6 UK 7	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? II Transferee Foreign Corporation Information (see instructions) NAME OF TRANSFERE (foreign corporation) NDEAVOUR ACQUISITION UK LIMITED Address (including country) ERSHEDS HOUSE, 70 GREAT BRIDGEWATER ST NCHESTER, MI 5ES UNITED KINGDOM Country code of country of incorporation or organization (See instructions)	EIN of 786859	partner	rship Yes Yes numbe	X No X No X No Pr, if any	
AC b c d Par 3 EN 5 EVE MAN 6 UK 7 CC	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? II Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) NDEAVOUR ACQUISITION UK LIMITED Address (including country) ERSHEDS HOUSE, 70 GREAT BRIDGEWATER ST NCHESTER, MI 5ES UNITED KINGDOM Country code of country of incorporation or organization Country code of country of incorporation or organization K Foreign law characterization (see instructions)	EIN of 786859	partner partner partner	rship Yes Yes numbe	X No X No X No Pr, if any Der	
AC b c d Par 3 EN 5 EVE MAN 6 UK 7	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership CCEL-KKR CAPITAL PARTNERS IV, LP 90-0 Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? It II Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) NDEAVOUR ACQUISITION UK LIMITED Address (including country) ERSHEDS HOUSE, 70 GREAT BRIDGEWATER ST NCHESTER, MI 5ES UNITED KINGDOM Country code of country of incorporation or organization Country code of country of incorporation or organization Country code of country of incorporation or organization Country code of country of incorporation a controlled foreign corporation?	EIN of 786859	partner partner partner partner partner partner partner partner	rship Yes Yes numbe	X No X No X No Pr, if any	

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2

Part III | Information Regarding Transfer of Property (see instructions) (a) (c) (d) (e) Type of Gain recognized on transfer Date of Description of Fair market value on Cost or other property transfer date of transfer property basis 12/02/2014 130,832. Cash Stock and securities Installment obligations, account receivables or similar property Foreign currency or other property denominated in foreign currency Inventory Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b)) Tangible property used in trade or business not listed under another category Intangible property Property to be leased (as described in final and temp. Regs. sec. 1.367(a)-4(c)) Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d)) Transfers of oil and gas working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e)) Other property Supplemental Information Required To Be Reported (see instructions):

Form	926	(Rev.	12-2013)
		(1100.	12 20 10)

		-1784340	Page 3
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:		
	(a) Before • 0000 % (b) After 31.6049 %		
	(a) Before		
10	Type of nonrecognition transaction (see instructions) ▶ SECTION 351		
11	Indicate whether any transfer reported in Part III is subject to any of the following:		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	Yes	X No
13	Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections		
	1.367(a)-4 through 1.367(a)-6 for any of the following:		
а	Tainted property	Yes	X No
b		Yes	X No
С	Branch loss recapture	Yes	X No
	Any other income recognition provision contained in the above-referenced regulations	Yes	X No
14	Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?	Yes	X No
15 a	Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section	Yes	X No
	1.367(a)-1T(d)(5)(iii)?	L Yes	LAL NO
b	If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$		
16	Was cash the only property transferred?	X Yes	☐ No
17 a	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?	Yes	X No
b	If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:		

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions
MAX M. & MARJORIE S. FISHER FOUNDATION,	
INC.	38-1784340
1 If the transferor was a corporation, complete questions 1a through 1d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5	or
fewer domestic corporations?	Yes No
b Did the transferor remain in existence after the transfer?	Yes No
If not, list the controlling shareholder(s) and their identifying number(s):	
Ocada di in a chanchaldan	11
Controlling shareholder	Identifying number
	····
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation of the parent corporation of the parent corporation:	on? Yes No
Name of parent corporation	EIN of parent corporation
d Harabasia disabasaha anda asatisa 007(a)(5) harabasaha	
d Have basis adjustments under section 367(a)(5) been made?	Yes No
2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such und	der section 367) complete
questions 2a through 2d.	zor occion corry, complete
a List the name and EIN of the transferor's partnership:	
Name of partnership	EIN of partnership
MDTDENM V ID	613069
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	
c Is the partner disposing of its entire interest in the partnership?	Yes X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	
securities market? Part II Transferee Foreign Corporation Information (see instructions)	Yes X No
3 Name of transferee (foreign corporation)	4a Identifying number, if any
BAYSHORE HOLDINGS LIMITED	
5 Address (including country)	4b Reference ID number
P.O. BOX 2267, WINDSOR PLACE, 3RD FLOOR, 22 QUEEN ST	
HAMILTON, HM JX BERMUDA	BAYSHOREHOLDING
6 Country code of country of incorporation or organization	- M
BD	
7 Foreign law characterization (see instructions)	
CORPORATION	\
8 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
LHA For Paperwork Reduction Act Notice, see separate instructions. 424531 05-01-14	Form 926 (Rev. 12-2013

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash			155,532.		
Stock and					
securities					
Installment obligations,					
account receivables or					
similar property					
Foreign currency or other					
property denominated in					
foreign currency					
Inventory					
Assets subject to					
depreciation recapture					
(see Temp. Regs. sec.					
1.367(a)-4T(b))					
Tangible property used in					
trade or business not listed					
under another category					
ļ.					
Intangible				. <u></u>	
property					
Property to be leased					
(as described in final					
and temp. Regs. sec.					
1.367(a)-4(c))					
Property to be sold					
(as described in					
Temp. Regs. sec.					
1.367(a)-4T(d))					
Transfers of oil and gas			_		
working interests (as					827
described in Temp.					
Regs. sec. 1.367(a)-4T(e))					
Other manager					
Other property					
}			+		
					L
Supplemental Informa CASH TRANSFERS	occurred occurred	To Be Reported (see ins	structions): ES DURING THE	YEAR ENDED	12/31/2014.

Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB No. 1545-0028

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
MAX M. & MARJORIE S. FISHER FOUNDATION,	
INC.	38-1784340
1 If the transferor was a corporation, complete questions 1a through 1d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 or	
fewer domestic corporations?	Yes No
b Did the transferor remain in existence after the transfer?	Yes No
If not, list the controlling shareholder(s) and their identifying number(s):	
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation If not, list the name and employer identification number (EIN) of the parent corporation:	? Yes No
Name of parent corporation Ell	N of parent corporation
d Have basis adjustments under section 367(a)(5) been made?	Yes No
2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under	section 367) complete
questions 2a through 2d.	oconomically, complete
a List the name and EIN of the transferor's partnership:	
Name of partnership	EIN of partnership
Name of partite ship	Env or parties stip
INFORMATION VENTURES I LP 35-251	0501
· · · · · · · · · · · · · · · · · · ·	
 b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? 	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	Tes La No
securities market?	Yes X No
Part II Transferee Foreign Corporation Information (see instructions)	
3 Name of transferee (foreign corporation)	4a Identifying number, if any
VERAFIN INC.	
	4b Reference ID number
570 NEWFOUNDLAND DRIVE	TION A PETAL
ST. JOHNS, NEWFOUNDLAND A1A 5BI CANADA	VERAFIN
6 Country code of country of incorporation or organization CA	
7 Foreign law characterization (see instructions)	
CORPORATION	
8 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
LHA For Paperwork Reduction Act Notice, see separate instructions.	Form 926 (Rev. 12-2013)
05-01-14	

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2

Part III Information Regarding Transfer of Property (see instructions)

(d) (e) Type of Description of Date of Fair market value on Cost or other Gain recognized on property transfer date of transfer property basis transfer 425. Cash 10/10/2014STOCK 2,897. Stock and securities Installment obligations, account receivables or similar property Foreign currency or other property denominated in foreign currency Inventory Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b)) Tangible property used in trade or business not listed under another category Intangible property Property to be leased (as described in final and temp. Regs. sec. 1.367(a)-4(c)) Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d)) Transfers of oil and gas working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e)) Other property Supplemental Information Required To Be Reported (see instructions): CASH TRANSFERS OCCURRED ON VARIOUS DATES DURING THE YEAR ENDED 12/31/2014.

		-1784340	Page 3
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:		
	(a) Before • 0000 % (b) After • 0011 %		
	(a) 251515		
10	Type of nonrecognition transaction (see instructions) ▶ SECTION 351		
11	Indicate whether any transfer reported in Part III is subject to any of the following:		
а	Gain recognition under section 904(f)(3)		X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
C	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	Yes	X No
13	Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections		
	1.367(a)-4 through 1.367(a)-6 for any of the following:		
а	Tainted property	Yes	X No
b	Depreciation recapture	Yes	X No
C	Branch loss recapture		X No
d		Yes Yes	X No
14	Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?	Yes	X No
15 a	Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?	Yes	X No
b	If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$		
16	Was cash the only property transferred?	Yes	X No
17 a	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?	Yes	X No
b	If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:		

Return by a U.S. Transferor of Property

to a Foreign Corporation

Information about Form 926 and its separate instructions is at www.irs.gov/form926.

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	distribution.		
Name of transferor		Identifying numb	er (see instructions)
MAX M. & MARJORIE S. FISHER FOUNDATION,			
INC.		38-1784	340
1 If the transferor was a corporation, complete questions 1a through 1d.			
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 36			
fewer domestic corporations? b Did the transferor remain in existence after the transfer?		Yes	⊢ No
If not, list the controlling shareholder(s) and their identifying number(s):		Yes	└─ No
Controlling shareholder	Ide	ntifying number	12
	<u>.</u>		
	= = =		
c If the transferor was a member of an affiliated group filing a consolidated return, was it the paren	t corporation?	Yes	No
If not, list the name and employer identification number (EIN) of the parent corporation:			
Name of parent corporation	EIN of	parent corporati	on
d Have basis adjustments under section 367(a)(5) been made?		Yes	□ No
2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated a	s such under sect	ion 367), comple	te
questions 2a through 2d.			
a List the name and EIN of the transferor's partnership:			
Name of partnership	EIN	of partnership	
THE FISHER FAIRWAY MASTER FUND LTD	98-06796	22	
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			X No
c Is the partner disposing of its entire interest in the partnership?		Yes	X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estable securities market?			X No
Part II Transferee Foreign Corporation Information (see instructions)		Yes	LAL NO
3 Name of transferee (foreign corporation)	4a I	dentifying numb	er. if anv
			,,
BREVAN HOWARD FUND LTD			
5 Address (including country)	4b F	Reference ID num	ber
P.O. BOX 309 GRAND CAYMAN, KY1-1104 CAYMAN ISLANDS	, DD	EVANHOWAI	אוזים חכ
6 Country code of country of incorporation or organization		EVANITOWAL	XDF UN
CJ			
7 Foreign law characterization (see instructions)			
CORPORATION			
8 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
LHA For Paperwork Reduction Act Notice, see separate instructions.		Form 926 (F	Rev. 12-2013)

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2 Part III Information Regarding Transfer of Property (see instructions) (d) (e) Type of Date of Gain recognized on transfer Description of Fair market value on Cost or other property date of transfer transfer property basis 1,336,235. 05/01/2014 Cash Stock and securities Installment obligations, account receivables or similar property Foreign currency or other property denominated in foreign currency inventory Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b)) Tangible property used in trade or business not listed under another category Intangible property Property to be leased (as described in final and temp. Regs. sec. 1.367(a)-4(c)) Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d)) Transfers of oil and gas working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e)) Other property Supplemental Information Required To Be Reported (see instructions):

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Form	926 (Rev	12	2012	

Return by a U.S. Transferor of Property

to a Foreign Corporation

► Information about Form 926 and its separate instructions is at www.irs.gov/form926.

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

OMB No. 1545-0026

Par	t I U.S. Transferor Information (see instructions)			
Name	e of transferor		Identifying numb	er (see instructions)
	X M. & MARJORIE S. FISHER FOUNDATION,			
_IN	ic.		38-1784	340
1	If the transferor was a corporation, complete questions 1a through 1d.			
а	If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c		 1	
	fewer domestic corporations?		Yes	∐ No
b	Did the transferor remain in existence after the transfer?		Yes	∟ No
	If not, list the controlling shareholder(s) and their identifying number(s):			
	Controlling shareholder	lo	dentifying number	
			-	
				····
C	If the transferor was a member of an affiliated group filing a consolidated return, was it the parent co	orporation?	····· Yes	L No
	If not, list the name and employer identification number (EIN) of the parent corporation:			
	Name of parent corporation	EIN	of parent corporati	ion
d	Have basis adjustments under section 367(a)(5) been made?		Yes	No
	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as su	uch under se	ection 367), comple	te
	questions 2a through 2d.			
а	List the name and EIN of the transferor's partnership:			
	Name of partnership	E	IN of partnership	
TH	E FISHER FAIRWAY MASTER FUND LTD	8-0679	622	
b	Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No
	Is the partner disposing of its entire interest in the partnership?		Yes	X No
d	Is the partner disposing of an interest in a limited partnership that is regularly traded on an establish	ed		
	securities market?		Yes	X No
Par				
3	Name of transferee (foreign corporation)	4a	Identifying numb	er, if any
BF	'AM ASIAN OPPORTUNITIES FUND LIMITED			
5	Address (including country)	4b	Reference ID num	ber
	ELGIN AVENUE	"	11010101100 12 11011	.501
GEC	RGE TOWN, KY1-9005 CAYMAN ISLANDS	B	FAMASIANO	PPORT
	Country code of country of incorporation or organization			
CJ				
	Foreign law characterization (see instructions)			
	PRPORATION			7.
8 LHA	Is the transferee foreign corporation a controlled foreign corporation? For Paperwork Reduction Act Notice, see separate instructions.		Yes	X No
424531 05-01-			FUHH 920 (I	Rev. 12-2013)

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2

Part III Information Regarding Transfer of Property (see instructions) (d) (e) Type of Date of Description of Fair market value on Cost or other Gain recognized on property transfer date of transfer property transfer basis 08/01/2014 1,781,646. Cash Stock and securities Installment obligations, account receivables or similar property Foreign currency or other property denominated in foreign currency Inventory Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b)) Tangible property used in trade or business not listed under another category Intangible property Property to be leased (as described in final and temp. Regs. sec. 1.367(a)-4(c)) Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d)) Transfers of oil and gas working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e)) Other property Supplemental Information Required To Be Reported (see instructions):

Form 9	26 (Rev	. 12-20	13)
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Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
MAX M. & MARJORIE S. FISHER FOUNDATION,	(200
INC.	38-1784340
If the transferor was a corporation, complete questions 1a through 1d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 o	_
, , , , , , , , , , , , , , , , , , , ,	
fewer domestic corporations?	
b Did the transferor remain in existence after the transfer?	Yes No
If not, list the controlling shareholder(s) and their identifying number(s):	
Controlling shareholder	Identifying number
	2
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation	n? Yes No
If not, list the name and employer identification number (EIN) of the parent corporation:	
Name of parent corporation E	IN of parent corporation
d the basis distance and a selice OCT/s/F) because do	
d Have basis adjustments under section 367(a)(5) been made?	Yes No
2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under	er section 367), complete
questions 2a through 2d.	
a List the name and EIN of the transferor's partnership:	
Name of partnership	EIN of partnership
MUE ETCUED EXTONAV MACMED PINTO IMD	70622
	79622
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	
c Is the partner disposing of its entire interest in the partnership?	Yes X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	
securities market?	Yes X No
Part II Transferee Foreign Corporation Information (see instructions)	
3 Name of transferee (foreign corporation)	4a Identifying number, if any
MYRIAD OPPORTUNITIES OFFSHORE FUND LIMITED	
5 Address (including country)	4b Reference ID number
P.O. BOX 309, UGLAND HOUSE	
GRAND CAYMAN, KY1-1104 CAYMAN ISLANDS	MYRIADOPPORTUNI
6 Country code of country of incorporation or organization	
CJ	
7 Foreign law characterization (see instructions)	
CORPORATION	
8 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
LHA For Paperwork Reduction Act Notice, see separate instructions.	Form 926 (Rev. 12-2013)
424531 05-01-14	. 5 525 (1.07. 12 2010)

Form 926 (Rev. 12-2013) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. 38-1784340 Page 2 Part III | Information Regarding Transfer of Property (see instructions) (a) (c) (d) (e) Type of Gain recognized on transfer Date of Description of Fair market value on Cost or other property transfer date of transfer property basis 05/01/2014 3,563,293. Cash Stock and securities Installment obligations, account receivables or similar property Foreign currency or other property denominated in foreign currency Inventory Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b)) Tangible property used in trade or business not listed under another category Intangible property Property to be leased (as described in final and temp. Regs. sec. 1.367(a)-4(c)) Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d)) Transfers of oil and gas working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e)) Other property Supplemental Information Required To Be Reported (see instructions):
