



MS. EMILY DIEGEL
MAX M. & MARJORIE S. FISHER FOUNDATION
TWO TOWNE SQUARE 900
SOUTHFIELD, MI 48076

DEAR EMILY:

ENCLOSED ARE YOUR 2022 EXEMPT ORGANIZATION RETURNS, AS FOLLOWS...

2022 FORM 990-PF

2022 FORM 990-T

2022 CALIFORNIA FORM 199

2022 CALIFORNIA FORM 109

2022 CALIFORNIA FORM RRF-1

2022 FLORIDA FORM F-1120

2022 NEW YORK FORM CT-13

2022 NORTH CAROLINA FORM CD-405

FOR ANY FORM IN THIS PACKAGE THAT REQUIRES MAILING, WE RECOMMEND THAT YOU USE CERTIFIED MAIL WITH POSTMARKED RECEIPTS FOR PROOF OF TIMELY FILING.

EACH ORIGINAL SHOULD BE DATED, SIGNED AND FILED IN ACCORDNCE WITH THE FILING INSTRUCTIONS. THE COPY SHOULD BE RETAINED FOR YOUR FILES.

WE SINCERELY APPRECIATE THE OPPORTUNITY TO SERVE YOU. PLEASE CONTACT US IF YOU HAVE ANY QUESTIONS CONCERNING THE TAX RETURNS.

VERY TRULY YOURS,

PLANTE & MORAN, PLLC

TAX RETURN FILING INSTRUCTIONS

FORM 990-PF

FOR THE YEAR ENDING

DECEMBER 31, 2022

PREPARED FOR:

MS. EMILY DIEGEL
MAX M. & MARJORIE S. FISHER FOUNDATION
TWO TOWNE SQUARE 900
SOUTHFIELD, MI 48076

PREPARED BY:

PLANTE & MORAN, PLLC
2601 CAMBRIDGE CT., STE. 300
AUBURN HILLS, MI 48326

AMOUNT DUE OR REFUND:

AN OVERPAYMENT OF \$221,544. THE ENTIRE OVERPAYMENT HAS BEEN APPLIED TO THE ESTIMATED TAX PAYMENTS.

MAKE CHECK PAYABLE TO:

NO AMOUNT IS DUE.

MAIL TAX RETURN AND CHECK (IF APPLICABLE) TO:

NOT APPLICABLE

RETURN MUST BE MAILED ON OR BEFORE:

RETURN FORM 8879-TE TO US BY NOVEMBER 15, 2023.

SPECIAL INSTRUCTIONS:

THIS RETURN HAS QUALIFIED FOR ELECTRONIC FILING. AFTER YOU HAVE REVIEWED THE RETURN FOR COMPLETENESS AND ACCURACY, PLEASE SIGN, DATE AND RETURN FORM 8879-TE TO OUR OFFICE. WE WILL TRANSMIT THE RETURN ELECTRONICALLY TO THE IRS.

PLEASE NOTE THAT THE FORM 990-PF RETURN CONTAINS EXCESS DISTRIBUTION CARRYOVER OF \$26,168,532. THIS MAY BE APPLIED TO TAX YEAR 2023 AND SUBSEQUENT YEARS.

AN ADDITIONAL COPY HAS BEEN PROVIDED TO FILE WITH THE STATE ATTORNEY GENERAL OFFICE. PLEASE SIGN, DATE AND FORWARD USING ONE OF THE METHODS LISTED ON THE ATTORNEY GENERAL COPY COVER LETTER.

Form **8879-TE**

IRS e-file Signature Authorization for a Tax Exempt Entity

OMB No. 1545-0047

For calendar year 2022, or fiscal year beginning _____, 2022, and ending _____, 20____

2022

Department of the Treasury
Internal Revenue Service

Do not send to the IRS. Keep for your records.

Go to www.irs.gov/Form8879TE for the latest information.

Name of filer **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.**

EIN or SSN
38-1784340

Name and title of officer or person subject to tax **DOUGLAS STEWART
EXECUTIVE DIRECTOR**

Part I Type of Return and Return Information

Check the box for the return for which you are using this Form 8879-TE and enter the applicable amount, if any, from the return. Form 8038-CP and Form 5330 filers may enter dollars and cents. For all other forms, enter whole dollars only. If you check the box on line 1a, 2a, 3a, 4a, 5a, 6a, 7a, 8a, 9a, or 10a below, and the amount on that line for the return being filed with this form was blank, then leave line 1b, 2b, 3b, 4b, 5b, 6b, 7b, 8b, 9b, or 10b, whichever is applicable, blank (do not enter -0-). But, if you entered -0- on the return, then enter -0- on the applicable line below. Do not complete more than one line in Part I.

| | | | |
|---------------------------------------|-------------------------------------|---|--------------------------|
| 1a Form 990 check here | <input type="checkbox"/> | b Total revenue , if any (Form 990, Part VIII, column (A), line 12) | 1b _____ |
| 2a Form 990-EZ check here ... | <input type="checkbox"/> | b Total revenue , if any (Form 990-EZ, line 9) | 2b _____ |
| 3a Form 1120-POL check here | <input type="checkbox"/> | b Total tax (Form 1120-POL, line 22) | 3b _____ |
| 4a Form 990-PF check here ... | <input checked="" type="checkbox"/> | b Tax based on investment income (Form 990-PF, Part V, line 5) | 4b <u>88,381.</u> |
| 5a Form 8868 check here | <input type="checkbox"/> | b Balance due (Form 8868, line 3c) | 5b _____ |
| 6a Form 990-T check here | <input type="checkbox"/> | b Total tax (Form 990-T, Part III, line 4) | 6b _____ |
| 7a Form 4720 check here | <input type="checkbox"/> | b Total tax (Form 4720, Part III, line 1) | 7b _____ |
| 8a Form 5227 check here | <input type="checkbox"/> | b FMV of assets at end of tax year (Form 5227, Item D) | 8b _____ |
| 9a Form 5330 check here | <input type="checkbox"/> | b Tax due (Form 5330, Part II, line 19) | 9b _____ |
| 10a Form 8038-CP check here | <input type="checkbox"/> | b Amount of credit payment requested (Form 8038-CP, Part III, line 22) | 10b _____ |

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

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

PIN: check one box only

I authorize **PLANTE & MORAN, PLLC** to enter my PIN **12345**
ERO firm name Enter five numbers, but do not enter all zeros

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

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

Signature of officer or person subject to tax

Date **11/15/23**

Part III Certification and Authentication

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

38569213579

Do not enter all zeros

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

ERO's signature **PLANTE & MORAN, PLLC**

Date **11/08/23**

ERO Must Retain This Form - See Instructions

Do Not Submit This Form to the IRS Unless Requested To Do So

LHA For Privacy Act and Paperwork Reduction Act Notice, see instructions.

Form **8879-TE** (2022)

Return of Private Foundation
or Section 4947(a)(1) Trust Treated as Private Foundation
Do not enter social security numbers on this form as it may be made public.
Go to www.irs.gov/Form990PF for instructions and the latest information.

For calendar year **2022** or tax year beginning _____, and ending _____

| | | |
|--|---|--|
| Name of foundation MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | | A Employer identification number 38-1784340 |
| Number and street (or P.O. box number if mail is not delivered to street address) TWO TOWNE SQUARE | Room/suite 900 | B Telephone number 248-415-4000 |
| City or town, state or province, country, and ZIP or foreign postal code SOUTHFIELD, MI 48076 | | C If exemption application is pending, check here ... <input type="checkbox"/> |
| G Check all that apply: <input type="checkbox"/> Initial return <input type="checkbox"/> Initial return of a former public charity <input type="checkbox"/> Final return <input type="checkbox"/> Amended return <input type="checkbox"/> Address change <input type="checkbox"/> Name change | | D 1. Foreign organizations, check here <input type="checkbox"/> 2. Foreign organizations meeting the 85% test, check here and attach computation <input type="checkbox"/> |
| H Check type of organization: <input checked="" type="checkbox"/> Section 501(c)(3) exempt private foundation <input type="checkbox"/> Section 4947(a)(1) nonexempt charitable trust <input type="checkbox"/> Other taxable private foundation | | E If private foundation status was terminated under section 507(b)(1)(A), check here ... <input type="checkbox"/> |
| I Fair market value of all assets at end of year (from Part II, col. (c), line 16) \$ 279,901,104. | J Accounting method: <input type="checkbox"/> Cash <input checked="" type="checkbox"/> Accrual <input type="checkbox"/> Other (specify) _____ | F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here ... <input type="checkbox"/> |

| Part I Analysis of Revenue and Expenses <small>(The total of amounts in columns (b), (c), and (d) may not necessarily equal the amounts in column (a).)</small> | | (a) Revenue and expenses per books | (b) Net investment income | (c) Adjusted net income | (d) Disbursements for charitable purposes (cash basis only) |
|---|---|------------------------------------|---------------------------|-------------------------|---|
| Revenue | 1 Contributions, gifts, grants, etc., received | 0. | | N/A | |
| | 2 Check <input checked="" type="checkbox"/> if the foundation is not required to attach Sch. B | | | | |
| | 3 Interest on savings and temporary cash investments | | | | |
| | 4 Dividends and interest from securities | 5,600,731. | 5,590,673. | | STATEMENT 2 |
| | 5a Gross rents | | | | |
| | b Net rental income or (loss) | | | | |
| | 6a Net gain or (loss) from sale of assets not on line 10 | 6,413,131. | | | STATEMENT 1 |
| | b Gross sales price for all assets on line 6a 109,900,175. | | | | |
| | 7 Capital gain net income (from Part IV, line 2) | | 5,416,089. | | |
| | 8 Net short-term capital gain | | | | |
| | 9 Income modifications | | | | |
| | 10a Gross sales less returns and allowances | | | | |
| b Less: Cost of goods sold | | | | | |
| c Gross profit or (loss) | | | | | |
| 11 Other income | -2,117,379. | -1,785,823. | | STATEMENT 3 | |
| 12 Total. Add lines 1 through 11 | 9,896,483. | 9,220,939. | | | |
| Operating and Administrative Expenses | 13 Compensation of officers, directors, trustees, etc. | 448,049. | 0. | | 448,049. |
| | 14 Other employee salaries and wages | 1,099,681. | 0. | | 1,099,681. |
| | 15 Pension plans, employee benefits | 427,227. | 0. | | 427,227. |
| | 16a Legal fees STMT 4 | 90,301. | 0. | | 102,597. |
| | b Accounting fees STMT 5 | 81,775. | 53,154. | | 113,247. |
| | c Other professional fees STMT 6 | 3,841,855. | 2,809,457. | | 832,411. |
| | 17 Interest | 13,410. | 0. | | 13,410. |
| | 18 Taxes STMT 7 | 211,721. | 0. | | 0. |
| | 19 Depreciation and depletion | 6,870. | 0. | | |
| | 20 Occupancy | 5,967. | 0. | | 5,967. |
| | 21 Travel, conferences, and meetings | 103,235. | 0. | | 103,235. |
| | 22 Printing and publications | 10,136. | 0. | | 10,164. |
| | 23 Other expenses STMT 8 | -575,658. | 0. | | -327,677. |
| | 24 Total operating and administrative expenses. Add lines 13 through 23 | 5,764,569. | 2,862,611. | | 2,828,311. |
| | 25 Contributions, gifts, grants paid | 17,362,342. | | | 14,595,199. |
| 26 Total expenses and disbursements. Add lines 24 and 25 | 23,126,911. | 2,862,611. | | 17,423,510. | |
| 27 Subtract line 26 from line 12: | | | | | |
| a Excess of revenue over expenses and disbursements ... | -13,230,428. | | | | |
| b Net investment income (if negative, enter -0-) | | 6,358,328. | | | |
| c Adjusted net income (if negative, enter -0-) | | | N/A | | |

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

Form 990-PF (2022)

38-1784340

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| Part II Balance Sheets <small>Attached schedules and amounts in the description column should be for end-of-year amounts only.</small> | | Beginning of year | End of year | |
|---|--|-------------------|----------------|-----------------------|
| | | (a) Book Value | (b) Book Value | (c) Fair Market Value |
| Assets | 1 Cash - non-interest-bearing | 62,986. | 109,444. | 109,444. |
| | 2 Savings and temporary cash investments | 8,709,361. | 10,256,377. | 10,256,377. |
| | 3 Accounts receivable <u>209,931.</u> | | | |
| | Less: allowance for doubtful accounts | 617,442. | 209,931. | 209,931. |
| | 4 Pledges receivable | | | |
| | Less: allowance for doubtful accounts | | | |
| | 5 Grants receivable | | | |
| | 6 Receivables due from officers, directors, trustees, and other disqualified persons | | | |
| | 7 Other notes and loans receivable | | | |
| | Less: allowance for doubtful accounts | | | |
| | 8 Inventories for sale or use | | | |
| | 9 Prepaid expenses and deferred charges | 2,949. | | |
| | 10a Investments - U.S. and state government obligations | | | |
| | b Investments - corporate stock | | | |
| | c Investments - corporate bonds | | | |
| | 11 Investments - land, buildings, and equipment: basis | | | |
| Less: accumulated depreciation | | | | |
| 12 Investments - mortgage loans | | | | |
| 13 Investments - other <u>STMT 10</u> | 324,612,769. | 262,578,768. | 262,578,768. | |
| 14 Land, buildings, and equipment: basis <u>106,078.</u> | | | | |
| Less: accumulated depreciation <u>STMT 11</u> <u>87,955.</u> | 16,824. | 18,123. | 18,123. | |
| 15 Other assets (describe <u>STATEMENT 12</u>) | 5,229,092. | 6,728,461. | 6,728,461. | |
| 16 Total assets (to be completed by all filers - see the instructions. Also, see page 1, item I) | 339,251,423. | 279,901,104. | 279,901,104. | |
| Liabilities | 17 Accounts payable and accrued expenses | 1,739,699. | 937,515. | |
| | 18 Grants payable | 5,212,820. | 7,811,627. | |
| | 19 Deferred revenue | | | |
| | 20 Loans from officers, directors, trustees, and other disqualified persons | | | |
| | 21 Mortgages and other notes payable | | | |
| | 22 Other liabilities (describe | | | |
| | 23 Total liabilities (add lines 17 through 22) | 6,952,519. | 8,749,142. | |
| Net Assets or Fund Balances | Foundations that follow FASB ASC 958, check here <input type="checkbox"/> | | | |
| | and complete lines 24, 25, 29, and 30. | | | |
| | 24 Net assets without donor restrictions | | | |
| | 25 Net assets with donor restrictions | | | |
| | Foundations that do not follow FASB ASC 958, check here <input checked="" type="checkbox"/> | | | |
| | and complete lines 26 through 30. | | | |
| | 26 Capital stock, trust principal, or current funds | 0. | 0. | |
| | 27 Paid-in or capital surplus, or land, bldg., and equipment fund | 0. | 0. | |
| 28 Retained earnings, accumulated income, endowment, or other funds ... | 332,298,904. | 271,151,962. | | |
| 29 Total net assets or fund balances | 332,298,904. | 271,151,962. | | |
| 30 Total liabilities and net assets/fund balances | 339,251,423. | 279,901,104. | | |

Part III Analysis of Changes in Net Assets or Fund Balances

| | | |
|---|---|--------------|
| 1 Total net assets or fund balances at beginning of year - Part II, column (a), line 29 (must agree with end-of-year figure reported on prior year's return) | 1 | 332,298,904. |
| 2 Enter amount from Part I, line 27a | 2 | -13,230,428. |
| 3 Other increases not included in line 2 (itemize) | 3 | 0. |
| 4 Add lines 1, 2, and 3 | 4 | 319,068,476. |
| 5 Decreases not included in line 2 (itemize) <u>SEE STATEMENT 9</u> | 5 | 47,916,514. |
| 6 Total net assets or fund balances at end of year (line 4 minus line 5) - Part II, column (b), line 29 | 6 | 271,151,962. |

Form 990-PF (2022)

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

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Part IV Capital Gains and Losses for Tax on Investment Income **SEE ATTACHED STATEMENTS**

| (a) List and describe the kind(s) of property sold (for example, real estate, 2-story brick warehouse; or common stock, 200 shs. MLC Co.) | (b) How acquired P - Purchase D - Donation | (c) Date acquired (mo., day, yr.) | (d) Date sold (mo., day, yr.) |
|---|--|--------------------------------------|----------------------------------|
| 1a | | | |
| b | | | |
| c | | | |
| d | | | |
| e | | | |

| (e) Gross sales price | (f) Depreciation allowed (or allowable) | (g) Cost or other basis plus expense of sale | (h) Gain or (loss) ((e) plus (f) minus (g)) |
|-----------------------|--|---|--|
| a | | | |
| b | | | |
| c | | | |
| d | | | |
| e | | | |
| 109,900,175. | | 118,380,696. | 5,416,089. |

| Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69. | | | (l) Gains (Col. (h) gain minus col. (k), but not less than -0-) or Losses (from col. (h)) |
|--|--------------------------------------|---|---|
| (i) FMV as of 12/31/69 | (j) Adjusted basis as of 12/31/69 | (k) Excess of col. (i) over col. (j), if any | |
| a | | | |
| b | | | |
| c | | | |
| d | | | |
| e | | | |
| | | | 5,416,089. |

| | | |
|---|---|-------------------|
| 2 Capital gain net income or (net capital loss) { If gain, also enter in Part I, line 7 If (loss), enter -0- in Part I, line 7 | 2 | 5,416,089. |
| 3 Net short-term capital gain or (loss) as defined in sections 1222(5) and (6): If gain, also enter in Part I, line 8, column (c). See instructions. If (loss), enter -0- in Part I, line 8 | 3 | N/A |

Part V Excise Tax Based on Investment Income (Section 4940(a), 4940(b), or 4948 - see instructions)

| | | | |
|--|-----------|-----------------|-----------------|
| 1a Exempt operating foundations described in section 4940(d)(2), check here <input type="checkbox"/> and enter "N/A" on line 1. Date of ruling or determination letter: _____ (attach copy of letter if necessary - see instructions) | | 1 | 88,381. |
| b All other domestic foundations enter 1.39% (0.0139) of line 27b. Exempt foreign organizations, enter 4% (0.04) of Part I, line 12, col. (b) | | | |
| 2 Tax under section 511 (domestic section 4947(a)(1) trusts and taxable foundations only; others, enter -0-) | | 2 | 0. |
| 3 Add lines 1 and 2 | | 3 | 88,381. |
| 4 Subtitle A (income) tax (domestic section 4947(a)(1) trusts and taxable foundations only; others, enter -0-) | | 4 | 0. |
| 5 Tax based on investment income. Subtract line 4 from line 3. If zero or less, enter -0- | | 5 | 88,381. |
| 6 Credits/Payments: | | | |
| a 2022 estimated tax payments and 2021 overpayment credited to 2022 | 6a | 150,000. | |
| b Exempt foreign organizations - tax withheld at source | 6b | 0. | |
| c Tax paid with application for extension of time to file (Form 8868) | 6c | 160,000. | |
| d Backup withholding erroneously withheld | 6d | 0. | |
| 7 Total credits and payments. Add lines 6a through 6d | | 7 | 310,000. |
| 8 Enter any penalty for underpayment of estimated tax. Check here <input checked="" type="checkbox"/> if Form 2220 is attached | | 8 | 75. |
| 9 Tax due. If the total of lines 5 and 8 is more than 7, enter amount owed | | 9 | |
| 10 Overpayment. If line 7 is more than the total of lines 5 and 8, enter the amount overpaid | | 10 | 221,544. |
| 11 Enter the amount of line 10 to be: Credited to 2023 estimated tax 221,544. Refunded | | 11 | 0. |

Form 990-PF (2022)

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

Part VI-A Statements Regarding Activities

| | | Yes | No |
|---|----|-----|----|
| 1a During the tax year, did the foundation attempt to influence any national, state, or local legislation or did it participate or intervene in any political campaign? | 1a | | X |
| b Did it spend more than \$100 during the year (either directly or indirectly) for political purposes? See the instructions for the definition If the answer is "Yes" to 1a or 1b, attach a detailed description of the activities and copies of any materials published or distributed by the foundation in connection with the activities. | 1b | | X |
| c Did the foundation file Form 1120-POL for this year? | 1c | | X |
| d Enter the amount (if any) of tax on political expenditures (section 4955) imposed during the year: (1) On the foundation. \$ <u>0.</u> (2) On foundation managers. \$ <u>0.</u> | | | |
| e Enter the reimbursement (if any) paid by the foundation during the year for political expenditure tax imposed on foundation managers. \$ <u>0.</u> | | | |
| 2 Has the foundation engaged in any activities that have not previously been reported to the IRS? | 2 | | X |
| If "Yes," attach a detailed description of the activities. | | | |
| 3 Has the foundation made any changes, not previously reported to the IRS, in its governing instrument, articles of incorporation, or bylaws, or other similar instruments? If "Yes," attach a conformed copy of the changes | 3 | | X |
| 4a Did the foundation have unrelated business gross income of \$1,000 or more during the year? | 4a | X | |
| b If "Yes," has it filed a tax return on Form 990-T for this year? | 4b | X | |
| 5 Was there a liquidation, termination, dissolution, or substantial contraction during the year? | 5 | | X |
| If "Yes," attach the statement required by General Instruction T. | | | |
| 6 Are the requirements of section 508(e) (relating to sections 4941 through 4945) satisfied either: • By language in the governing instrument, or • By state legislation that effectively amends the governing instrument so that no mandatory directions that conflict with the state law remain in the governing instrument? | 6 | X | |
| 7 Did the foundation have at least \$5,000 in assets at any time during the year? If "Yes," complete Part II, col. (c), and Part XIV | 7 | X | |
| 8a Enter the states to which the foundation reports or with which it is registered. See instructions. _____ <u>MI, CA</u> | | | |
| b If the answer is "Yes" to line 7, has the foundation furnished a copy of Form 990-PF to the Attorney General (or designate) of each state as required by General Instruction G? If "No," attach explanation | 8b | X | |
| 9 Is the foundation claiming status as a private operating foundation within the meaning of section 4942(j)(3) or 4942(j)(5) for calendar year 2022 or the tax year beginning in 2022? See the instructions for Part XIII. If "Yes," complete Part XIII | 9 | | X |
| 10 Did any persons become substantial contributors during the tax year? If "Yes," attach a schedule listing their names and addresses | 10 | | X |
| 11 At any time during the year, did the foundation, directly or indirectly, own a controlled entity within the meaning of section 512(b)(13)? If "Yes," attach schedule. See instructions | 11 | | X |
| 12 Did the foundation make a distribution to a donor advised fund over which the foundation or a disqualified person had advisory privileges? If "Yes," attach statement. See instructions <u>SEE STATEMENT 14 SEE STATEMENT 15</u> | 12 | X | |
| 13 Did the foundation comply with the public inspection requirements for its annual returns and exemption application? Website address <u>WWW.MMFISHER.ORG</u> | 13 | X | |
| 14 The books are in care of <u>EMILY DIEGEL</u> Telephone no. <u>248-415-1440</u> Located at <u>TWO TOWNE SQUARE #900, SOUTHFIELD, MI</u> ZIP+4 <u>48076</u> | | | |
| 15 Section 4947(a)(1) nonexempt charitable trusts filing Form 990-PF in lieu of Form 1041 - check here <input type="checkbox"/> and enter the amount of tax-exempt interest received or accrued during the year | 15 | N/A | |
| 16 At any time during calendar year 2022, did the foundation have an interest in or a signature or other authority over a bank, securities, or other financial account in a foreign country? | 16 | X | |
| See the instructions for exceptions and filing requirements for FinCEN Form 114. If "Yes," enter the name of the foreign country <u>SEE STATEMENT 13</u> | | | |

Part VI-B Statements Regarding Activities for Which Form 4720 May Be Required

File Form 4720 if any item is checked in the "Yes" column, unless an exception applies.

| | Yes | No |
|--|-------|-----|
| 1a During the year, did the foundation (either directly or indirectly): | | |
| (1) Engage in the sale or exchange, or leasing of property with a disqualified person? | 1a(1) | X |
| (2) Borrow money from, lend money to, or otherwise extend credit to (or accept it from) a disqualified person? | 1a(2) | X |
| (3) Furnish goods, services, or facilities to (or accept them from) a disqualified person? | 1a(3) | X |
| (4) Pay compensation to, or pay or reimburse the expenses of, a disqualified person? | 1a(4) | X |
| (5) Transfer any income or assets to a disqualified person (or make any of either available for the benefit or use of a disqualified person)? | 1a(5) | X |
| (6) Agree to pay money or property to a government official? (Exception. Check "No" if the foundation agreed to make a grant to or to employ the official for a period after termination of government service, if terminating within 90 days.) | 1a(6) | X |
| b If any answer is "Yes" to 1a(1)-(6), did any of the acts fail to qualify under the exceptions described in Regulations section 53.4941(d)-3 or in a current notice regarding disaster assistance? See instructions | 1b | X |
| c Organizations relying on a current notice regarding disaster assistance, check here <input type="checkbox"/> | | |
| d Did the foundation engage in a prior year in any of the acts described in 1a, other than excepted acts, that were not corrected before the first day of the tax year beginning in 2022? | 1d | X |
| 2 Taxes on failure to distribute income (section 4942) (does not apply for years the foundation was a private operating foundation defined in section 4942(j)(3) or 4942(j)(5)): | | |
| a At the end of tax year 2022, did the foundation have any undistributed income (Part XII, lines 6d and 6e) for tax year(s) beginning before 2022? | 2a | X |
| If "Yes," list the years _____, _____, _____, _____ | | |
| b Are there any years listed in 2a for which the foundation is not applying the provisions of section 4942(a)(2) (relating to incorrect valuation of assets) to the year's undistributed income? (If applying section 4942(a)(2) to all years listed, answer "No" and attach statement - see instructions.) | 2b | N/A |
| c If the provisions of section 4942(a)(2) are being applied to any of the years listed in 2a, list the years here. _____, _____, _____, _____ | | |
| 3a Did the foundation hold more than a 2% direct or indirect interest in any business enterprise at any time during the year? | 3a | X |
| b If "Yes," did it have excess business holdings in 2022 as a result of (1) any purchase by the foundation or disqualified persons after May 26, 1969; (2) the lapse of the 5-year period (or longer period approved by the Commissioner under section 4943(c)(7)) to dispose of holdings acquired by gift or bequest; or (3) the lapse of the 10-, 15-, or 20-year first phase holding period? (Use Form 4720, Schedule C, to determine if the foundation had excess business holdings in 2022.) | 3b | N/A |
| 4a Did the foundation invest during the year any amount in a manner that would jeopardize its charitable purposes? | 4a | X |
| b Did the foundation make any investment in a prior year (but after December 31, 1969) that could jeopardize its charitable purpose that had not been removed from jeopardy before the first day of the tax year beginning in 2022? | 4b | X |

Part VI-B Statements Regarding Activities for Which Form 4720 May Be Required (continued)

| | Yes | No |
|--|-----|----|
| 5a During the year, did the foundation pay or incur any amount to: | | |
| (1) Carry on propaganda, or otherwise attempt to influence legislation (section 4945(e))? | | X |
| (2) Influence the outcome of any specific public election (see section 4955); or to carry on, directly or indirectly, any voter registration drive? | | X |
| (3) Provide a grant to an individual for travel, study, or other similar purposes? | | X |
| (4) Provide a grant to an organization other than a charitable, etc., organization described in section 4945(d)(4)(A)? See instructions | X | |
| (5) Provide for any purpose other than religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals? | | X |
| b If any answer is "Yes" to 5a(1)-(5), did any of the transactions fail to qualify under the exceptions described in Regulations section 53.4945 or in a current notice regarding disaster assistance? See instructions | | X |
| c Organizations relying on a current notice regarding disaster assistance, check here <input type="checkbox"/> | | |
| d If the answer is "Yes" to question 5a(4), does the foundation claim exemption from the tax because it maintained expenditure responsibility for the grant? SEE STATEMENT 17 | X | |
| If "Yes," attach the statement required by Regulations section 53.4945-5(d). | | |
| 6a Did the foundation, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract? | | X |
| b Did the foundation, during the year, pay premiums, directly or indirectly, on a personal benefit contract? If "Yes" to 6b, file Form 8870. | | X |
| 7a At any time during the tax year, was the foundation a party to a prohibited tax shelter transaction? | | X |
| b If "Yes," did the foundation receive any proceeds or have any net income attributable to the transaction? N/A | | |
| 8 Is the foundation subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or excess parachute payment(s) during the year? | | X |

Part VII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors

1 List all officers, directors, trustees, and foundation managers and their compensation.

| (a) Name and address | (b) Title, and average hours per week devoted to position | (c) Compensation (If not paid, enter -0-) | (d) Contributions to employee benefit plans and deferred compensation | (e) Expense account, other allowances |
|----------------------|---|---|---|---------------------------------------|
| SEE STATEMENT 16 | | 448,049. | 49,539. | 0. |
| | | | | |
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| | | | | |

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

| (a) Name and address of each employee paid more than \$50,000 | (b) Title, and average hours per week devoted to position | (c) Compensation | (d) Contributions to employee benefit plans and deferred compensation | (e) Expense account, other allowances |
|--|---|------------------|---|---------------------------------------|
| CYNTHIA ROWELL - TWO TOWNE SQUARE, SUITE 900, SOUTHFIELD, MI 48076 | PROGRAM MANAGER 40.00 | 200,545. | 38,206. | 0. |
| MEREDITH FREEMAN - TWO TOWNE SQUARE, SUITE 900, SOUTHFIELD, MI 48076 | SENIOR PROGRAM OFFICER 40.00 | 182,849. | 29,093. | 0. |
| JENNIFER A. FAHNESTOCK - TWO TOWNE SQUARE, SUITE 900, SOUTHFIELD, MI | GRANTS MANAGER 40.00 | 150,409. | 35,261. | 0. |
| CAMARRAH MORGAN - TWO TOWNE SQUARE, SUITE 900, SOUTHFIELD, MI 48076 | PROGRAM OFFICER 40.00 | 134,820. | 34,657. | 0. |
| CHELSEA LANDRY - TWO TOWNE SQUARE, SUITE 900, SOUTHFIELD, MI 48076 | PROGRAM OFFICER 40.00 | 107,000. | 12,887. | 0. |
| Total number of other employees paid over \$50,000 | | | | 4 |

Part VII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors (continued)

3 Five highest-paid independent contractors for professional services. If none, enter "NONE."

| (a) Name and address of each person paid more than \$50,000 | (b) Type of service | (c) Compensation |
|---|--|------------------|
| TFG, LLC - TWO TOWNE SQUARE SUITE 900, SOUTHFIELD, MI 48076 | SERVICE PROVIDER FEES/SHARED SERVICES | 1510629. |
| NEUBERGER BERMAN 225 GRATIOT AVE, DETROIT, MI 48226 | FINANCIAL MANAGEMENT SERVICES | 677,829. |
| AVIVAR CAPITAL - 6464 SUNSET BLVD SUITE 1180, LOS ANGELES, CA 90028 | PROGRAM CONSULTING FEES | 113,750. |
| PLANTE MORAN - 3000 TOWN CENTER SUITE 100, SOUTHFIELD, MI 48075 | ACCOUNTING FEES | 105,270. |
| CATALYST EVALUATION 16855 PLAINVIEW, DETROIT, MI 48219 | PROGRAM CONSULTING FEES | 75,058. |
| Total number of others receiving over \$50,000 for professional services | | 1 |

Part VIII-A Summary of Direct Charitable Activities

| List the foundation's four largest direct charitable activities during the tax year. Include relevant statistical information such as the number of organizations and other beneficiaries served, conferences convened, research papers produced, etc. | Expenses |
|--|----------|
| 1 N/A | |
| 2 | |
| 3 | |
| 4 | |

Part VIII-B Summary of Program-Related Investments

| Describe the two largest program-related investments made by the foundation during the tax year on lines 1 and 2. | Amount |
|--|-------------------|
| 1 DETROIT FOOD COMMONS - THE ORGANIZATION FOCUSES ON PROVIDING ACCESS TO FRESH, HEALTHY FOODS IN DETROIT'S NORTH END. | 750,000. |
| 2 SEE STATEMENT 18 | 500,000. |
| 3 - OGEN - INDUSTRIAL SEWING AND INNOVATION CENTER - EQUITABLE PROSPERITY FUND LP - BLACK LEADERS DETROIT | 1,082,197. |
| Total. Add lines 1 through 3 | 2,332,197. |

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

| | | | |
|---|---|----|--------------|
| 1 Fair market value of assets not used (or held for use) directly in carrying out charitable, etc., purposes: | | | |
| a | Average monthly fair market value of securities | 1a | 278,121,986. |
| b | Average of monthly cash balances | 1b | 10,911,795. |
| c | Fair market value of all other assets (see instructions) | 1c | |
| d | Total (add lines 1a, b, and c) | 1d | 289,033,781. |
| e | Reduction claimed for blockage or other factors reported on lines 1a and 1c (attach detailed explanation) | 1e | 0. |
| 2 | Acquisition indebtedness applicable to line 1 assets | 2 | 0. |
| 3 | Subtract line 2 from line 1d | 3 | 289,033,781. |
| 4 | Cash deemed held for charitable activities. Enter 1.5% (0.015) of line 3 (for greater amount, see instructions) | 4 | 4,335,507. |
| 5 | Net value of noncharitable-use assets. Subtract line 4 from line 3 | 5 | 284,698,274. |
| 6 | Minimum investment return. Enter 5% (0.05) of line 5 | 6 | 14,234,914. |

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

| | | | |
|----|--|----|-------------|
| 1 | Minimum investment return from Part IX, line 6 | 1 | 14,234,914. |
| 2a | Tax on investment income for 2022 from Part V, line 5 | 2a | 88,381. |
| b | Income tax for 2022. (This does not include the tax from Part V.) | 2b | 24,522. |
| c | Add lines 2a and 2b | 2c | 112,903. |
| 3 | Distributable amount before adjustments. Subtract line 2c from line 1 | 3 | 14,122,011. |
| 4 | Recoveries of amounts treated as qualifying distributions | 4 | 253,167. |
| 5 | Add lines 3 and 4 | 5 | 14,375,178. |
| 6 | Deduction from distributable amount (see instructions) | 6 | 0. |
| 7 | Distributable amount as adjusted. Subtract line 6 from line 5. Enter here and on Part XII, line 1 | 7 | 14,375,178. |

Part XI Qualifying Distributions (see instructions)

| | | | |
|--|---|----|-------------|
| 1 Amounts paid (including administrative expenses) to accomplish charitable, etc., purposes: | | | |
| a | Expenses, contributions, gifts, etc. - total from Part I, column (d), line 26 | 1a | 17,423,510. |
| b | Program-related investments - total from Part VIII-B | 1b | 2,332,197. |
| 2 | Amounts paid to acquire assets used (or held for use) directly in carrying out charitable, etc., purposes | 2 | |
| 3 | Amounts set aside for specific charitable projects that satisfy the: | | |
| a | Suitability test (prior IRS approval required) | 3a | |
| b | Cash distribution test (attach the required schedule) | 3b | |
| 4 | Qualifying distributions. Add lines 1a through 3b. Enter here and on Part XII, line 4 | 4 | 19,755,707. |

Part XII Undistributed Income (see instructions)

| | (a) Corpus | (b) Years prior to 2021 | (c) 2021 | (d) 2022 |
|--|---------------|----------------------------|-------------|-------------|
| 1 Distributable amount for 2022 from Part X, line 7 | | | | 14,375,178. |
| 2 Undistributed income, if any, as of the end of 2022: | | | | |
| a Enter amount for 2021 only | | | 0. | |
| b Total for prior years: | | 0. | | |
| 3 Excess distributions carryover, if any, to 2022: | | | | |
| a From 2017 | 2,691,173. | | | |
| b From 2018 | 2,651,404. | | | |
| c From 2019 | 5,114,148. | | | |
| d From 2020 | 9,447,926. | | | |
| e From 2021 | 3,574,525. | | | |
| f Total of lines 3a through e | 23,479,176. | | | |
| 4 Qualifying distributions for 2022 from Part XI, line 4: \$ 19,755,707. | | | | |
| a Applied to 2021, but not more than line 2a | | | 0. | |
| b Applied to undistributed income of prior years (Election required - see instructions) | | 0. | | |
| c Treated as distributions out of corpus (Election required - see instructions) | 0. | | | |
| d Applied to 2022 distributable amount | | | | 14,375,178. |
| e Remaining amount distributed out of corpus | 5,380,529. | | | |
| 5 Excess distributions carryover applied to 2022 (If an amount appears in column (d), the same amount must be shown in column (a).) | 0. | | | 0. |
| 6 Enter the net total of each column as indicated below: | 28,859,705. | | | |
| a Corpus. Add lines 3f, 4c, and 4e. Subtract line 5 | | | | |
| b Prior years' undistributed income. Subtract line 4b from line 2b | | 0. | | |
| c Enter the amount of prior years' undistributed income for which a notice of deficiency has been issued, or on which the section 4942(a) tax has been previously assessed | | 0. | | |
| d Subtract line 6c from line 6b. Taxable amount - see instructions | | 0. | | |
| e Undistributed income for 2021. Subtract line 4a from line 2a. Taxable amount - see instr. | | | 0. | |
| f Undistributed income for 2022. Subtract lines 4d and 5 from line 1. This amount must be distributed in 2023 | | | | 0. |
| 7 Amounts treated as distributions out of corpus to satisfy requirements imposed by section 170(b)(1)(F) or 4942(g)(3) (Election may be required - see instructions) | 0. | | | |
| 8 Excess distributions carryover from 2017 not applied on line 5 or line 7 | 2,691,173. | | | |
| 9 Excess distributions carryover to 2023. Subtract lines 7 and 8 from line 6a | 26,168,532. | | | |
| 10 Analysis of line 9: | | | | |
| a Excess from 2018 | 2,651,404. | | | |
| b Excess from 2019 | 5,114,148. | | | |
| c Excess from 2020 | 9,447,926. | | | |
| d Excess from 2021 | 3,574,525. | | | |
| e Excess from 2022 | 5,380,529. | | | |

Part XIII Private Operating Foundations (see instructions and Part VI-A, question 9) N/A

1 a If the foundation has received a ruling or determination letter that it is a private operating foundation, and the ruling is effective for 2022, enter the date of the ruling _____

b Check box to indicate whether the foundation is a private operating foundation described in section _____ 4942(j)(3) or 4942(j)(5)

| | Tax year | | | | (e) Total |
|--|----------|----------|----------|----------|-----------|
| | (a) 2022 | (b) 2021 | (c) 2020 | (d) 2019 | |
| 2 a Enter the lesser of the adjusted net income from Part I or the minimum investment return from Part IX for each year listed _____ | | | | | |
| b 85% (0.85) of line 2a _____ | | | | | |
| c Qualifying distributions from Part XI, line 4, for each year listed _____ | | | | | |
| d Amounts included in line 2c not used directly for active conduct of exempt activities _____ | | | | | |
| e Qualifying distributions made directly for active conduct of exempt activities. Subtract line 2d from line 2c _____ | | | | | |
| 3 Complete 3a, b, or c for the alternative test relied upon: | | | | | |
| a "Assets" alternative test - enter: | | | | | |
| (1) Value of all assets _____ | | | | | |
| (2) Value of assets qualifying under section 4942(j)(3)(B)(i) _____ | | | | | |
| b "Endowment" alternative test - enter 2/3 of minimum investment return shown in Part IX, line 6, for each year listed _____ | | | | | |
| c "Support" alternative test - enter: | | | | | |
| (1) Total support other than gross investment income (interest, dividends, rents, payments on securities loans (section 512(a)(5)), or royalties) _____ | | | | | |
| (2) Support from general public and 5 or more exempt organizations as provided in section 4942(j)(3)(B)(iii) _____ | | | | | |
| (3) Largest amount of support from an exempt organization _____ | | | | | |
| (4) Gross investment income _____ | | | | | |

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

1 Information Regarding Foundation Managers:
a List any managers of the foundation who have contributed more than 2% of the total contributions received by the foundation before the close of any tax year (but only if they have contributed more than \$5,000). (See section 507(d)(2).)
NONE

b List any managers of the foundation who own 10% or more of the stock of a corporation (or an equally large portion of the ownership of a partnership or other entity) of which the foundation has a 10% or greater interest.
NONE

2 Information Regarding Contribution, Grant, Gift, Loan, Scholarship, etc., Programs:
 Check here if the foundation only makes contributions to preselected charitable organizations and does not accept unsolicited requests for funds. If the foundation makes gifts, grants, etc., to individuals or organizations under other conditions, complete items 2a, b, c, and d.

a The name, address, and telephone number or email address of the person to whom applications should be addressed:

b The form in which applications should be submitted and information and materials they should include:

c Any submission deadlines:

d Any restrictions or limitations on awards, such as by geographical areas, charitable fields, kinds of institutions, or other factors:

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

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Part XIV Supplementary Information *(continued)*

| 3 Grants and Contributions Paid During the Year or Approved for Future Payment | | | | |
|---|---|--------------------------------|---|--------------------|
| Recipient | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
| Name and address (home or business) | | | | |
| a Paid during the year | | | | |
| 21/64 INC. 445 PARK AVE, SUITE 16A NEW YORK CITY, NY 10022 | | PC | COLOR PILOT PROJECT | 10,000. |
| 826 MICHIGAN 115 E LIBERTY ST. ANN ARBOR, MI 48104 | | PC | YOUTH CREATIVE WRITING AND PUBLISHING PROGRAMS | 50,000. |
| 826 MICHIGAN 115 E LIBERTY ST. ANN ARBOR, MI 48104 | | PC | 2022 GENERAL OPERATING SUPPORT | 10,000. |
| 826 MICHIGAN 115 E LIBERTY ST. ANN ARBOR, MI 48104 | | PC | 2022 GENERAL OPERATING SUPPORT | 16,634. |
| ALLIED MEDIA PROJECTS F/B/O SHAKESPEARE IN DETROIT 4731 GRAND RIVER AVE, SUITE 400 DETROIT, MI 48208 | | PC | ARTISTIC AND VOCATIONAL TRAINING FOR DETROIT STUDENTS | 50,000. |
| Total | SEE CONTINUATION SHEET(S) | | | 14,595,199. |
| b Approved for future payment | | | | |
| NONE | | | | |
| | | | | |
| | | | | |
| Total | | | | 0. |

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Part XV-A Analysis of Income-Producing Activities

| Enter gross amounts unless otherwise indicated. | Unrelated business income | | Excluded by section 512, 513, or 514 | | (e) Related or exempt function income |
|--|---------------------------|---------------|--------------------------------------|---------------|---|
| | (a) Business code | (b) Amount | (c) Exclu- sion code | (d) Amount | |
| 1 Program service revenue: | | | | | |
| a _____ | | | | | |
| b _____ | | | | | |
| c _____ | | | | | |
| d _____ | | | | | |
| e _____ | | | | | |
| f _____ | | | | | |
| g Fees and contracts from government agencies | | | | | |
| 2 Membership dues and assessments | | | | | |
| 3 Interest on savings and temporary cash investments | | | | | |
| 4 Dividends and interest from securities | | | 14 | 5,600,731. | |
| 5 Net rental income or (loss) from real estate: | | | | | |
| a Debt-financed property | | | | | |
| b Not debt-financed property | | | | | |
| 6 Net rental income or (loss) from personal property | | | | | |
| 7 Other investment income | | | | | |
| 8 Gain or (loss) from sales of assets other than inventory | 531390 | 997,042. | 18 | 5,416,089. | |
| 9 Net income or (loss) from special events | | | | | |
| 10 Gross profit or (loss) from sales of inventory | | | | | |
| 11 Other revenue: | | | | | |
| a SEE STATEMENT 19 | | -331,556. | | -1,856,414. | 70,591. |
| b _____ | | | | | |
| c _____ | | | | | |
| d _____ | | | | | |
| e _____ | | | | | |
| 12 Subtotal. Add columns (b), (d), and (e) | | 665,486. | | 9,160,406. | 70,591. |
| 13 Total. Add line 12, columns (b), (d), and (e) | | | 13 | | 9,896,483. |

(See worksheet in line 13 instructions to verify calculations.)

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

| Line No. | Explain below how each activity for which income is reported in column (e) of Part XV-A contributed importantly to the accomplishment of the foundation's exempt purposes (other than by providing funds for such purposes). |
|----------|--|
| 11 | AMOUNTS REPRESENT INTEREST ON LOANS MADE TO ORGANIZATIONS WHOSE MISSION IS CONSISTENT WITH THAT OF THE FOUNDATION. |
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Part XVI Information Regarding Transfers to and Transactions and Relationships With Noncharitable Exempt Organizations

| | | Yes | No |
|----------|--|-----|-------------------------------------|
| 1 | Did the organization directly or indirectly engage in any of the following with any other organization described in section 501(c) (other than section 501(c)(3) organizations) or in section 527, relating to political organizations? | | |
| a | Transfers from the reporting foundation to a noncharitable exempt organization of: | | |
| (1) | Cash | | <input checked="" type="checkbox"/> |
| (2) | Other assets | | <input checked="" type="checkbox"/> |
| b | Other transactions: | | |
| (1) | Sales of assets to a noncharitable exempt organization | | <input checked="" type="checkbox"/> |
| (2) | Purchases of assets from a noncharitable exempt organization | | <input checked="" type="checkbox"/> |
| (3) | Rental of facilities, equipment, or other assets | | <input checked="" type="checkbox"/> |
| (4) | Reimbursement arrangements | | <input checked="" type="checkbox"/> |
| (5) | Loans or loan guarantees | | <input checked="" type="checkbox"/> |
| (6) | Performance of services or membership or fundraising solicitations | | <input checked="" type="checkbox"/> |
| c | Sharing of facilities, equipment, mailing lists, other assets, or paid employees | | <input checked="" type="checkbox"/> |
| d | If the answer to any of the above is "Yes," complete the following schedule. Column (b) should always show the fair market value of the goods, other assets, or services given by the reporting foundation. If the foundation received less than fair market value in any transaction or sharing arrangement, show in column (d) the value of the goods, other assets, or services received. | | |

| (a) Line no. | (b) Amount involved | (c) Name of noncharitable exempt organization | (d) Description of transfers, transactions, and sharing arrangements |
|--------------|---------------------|---|--|
| | | N/A | |
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2a Is the foundation directly or indirectly affiliated with, or related to, one or more tax-exempt organizations described in section 501(c) (other than section 501(c)(3)) or in section 527? Yes No

b If "Yes," complete the following schedule.

| (a) Name of organization | (b) Type of organization | (c) Description of relationship |
|--------------------------|--------------------------|---------------------------------|
| N/A | | |
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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, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Signature of officer or trustee: _____ Date: _____ Title: **EXECUTIVE DIRECTOR**

May the IRS discuss this return with the preparer shown below? See instr.
 Yes No

| | | | | | |
|-------------------------------|---|----------------------|----------|---|-----------|
| Paid Preparer Use Only | Print/Type preparer's name | Preparer's signature | Date | Check <input type="checkbox"/> if self-employed | PTIN |
| | DORI J. EGGETT | DORI J. EGGETT | 11/08/23 | | P00645252 |
| | Firm's name PLANTE & MORAN, PLLC | | | Firm's EIN 38-1357951 | |
| | Firm's address 2601 CAMBRIDGE CT., STE. 300 AUBURN HILLS, MI 48326 | | | Phone no. (248) 375-7100 | |

Part IV Capital Gains and Losses for Tax on Investment Income

| (a) List and describe the kind(s) of property sold, e.g., real estate, 2-story brick warehouse; or common stock, 200 shs. MLC Co. | (b) How acquired P - Purchase D - Donation | (c) Date acquired (mo., day, yr.) | (d) Date sold (mo., day, yr.) |
|---|--|--------------------------------------|----------------------------------|
| 1a BLACKSTONE RE PARTNERS V.TE.2 | P | | |
| b BLACKSTONE RE PARTNERS VI.TE.2 | P | | |
| c BLACKSTONE RE PARTNERS VI.TE.2-NQ | P | | |
| d BLACKSTONE RE PARTNERS X.F | P | | |
| e BREP VII.F (AV-LH) | P | | |
| f BREP VII.F (AV-LH.4) | P | | |
| g BREP VII.F-NQ (AV-LH.3) | P | | |
| h BREP VII.F-NQ (AV-LH.4) | P | | |
| i BREP VIII.F | P | | |
| j BREP VIII.F (AV-LH) | P | | |
| k BREP VIII.F (AV-LH.3) | P | | |
| l BREP VIII.F (AV-LH.4) | P | | |
| m BREP VIII.F-NQ (AV-LH) | P | | |
| n BREP VIII.F-NQ (AV-LH.2) | P | | |
| o BREP VIII.F-NQ (AV-LH.3) | P | | |

| (e) Gross sales price | (f) Depreciation allowed (or allowable) | (g) Cost or other basis plus expense of sale | (h) Gain or (loss) (e) plus (f) minus (g) |
|-----------------------|--|---|--|
| a | | | 0. |
| b | | | 0. |
| c | | | 0. |
| d | | | 0. |
| e | | | 0. |
| f | | | 0. |
| g | | | 0. |
| h | | | 0. |
| i | | | 0. |
| j | | | 0. |
| k | | | 0. |
| l | | | 0. |
| m | | | 0. |
| n | | | 0. |
| o | | | 0. |

| Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69 | | | (l) Losses (from col. (h)) Gains (excess of col. (h) gain over col. (k), but not less than "-0-") |
|---|--------------------------------------|---|---|
| (i) F.M.V. as of 12/31/69 | (j) Adjusted basis as of 12/31/69 | (k) Excess of col. (i) over col. (j), if any | |
| a | | | 0. |
| b | | | 0. |
| c | | | 0. |
| d | | | 0. |
| e | | | 0. |
| f | | | 0. |
| g | | | 0. |
| h | | | 0. |
| i | | | 0. |
| j | | | 0. |
| k | | | 0. |
| l | | | 0. |
| m | | | 0. |
| n | | | 0. |
| o | | | 0. |

| | | |
|---|---|--|
| 2 Capital gain net income or (net capital loss) { If gain, also enter in Part I, line 7 If (loss), enter "-0-" in Part I, line 7 } | 2 | |
| 3 Net short-term capital gain or (loss) as defined in sections 1222(5) and (6): If gain, also enter in Part I, line 8, column (c). If (loss), enter "-0-" in Part I, line 8 | 3 | |

Part IV Capital Gains and Losses for Tax on Investment Income

| (a) List and describe the kind(s) of property sold, e.g., real estate, 2-story brick warehouse; or common stock, 200 shs. MLC Co. | (b) How acquired P - Purchase D - Donation | (c) Date acquired (mo., day, yr.) | (d) Date sold (mo., day, yr.) |
|---|--|--------------------------------------|----------------------------------|
| 1a BREP VIII.F-NQ (AV-LH.4) | P | | |
| b FPA APARTMENT OPPORTUNITY FUND V-A | P | | |
| c MAXIMUM PRIVATE GROWTH FUND | P | | |
| d SCULPTOR REAL ESTATE PARALLEL FUND III A | P | | |
| e SQUARE MILE PARTNERS III TE | P | | |
| f TRIDENT V LP | P | | |
| g ACADIAN EMERGING MARKETS SMALL CAP EQUITY FUND | P | | |
| h AETHER REAL ASSETS I LP | P | | |
| i AIO V AIV LP | P | | |
| j BLACKSTONE RE PARTNERS V.TE.2 | P | | |
| k BLACKSTONE RE PARTNERS VI.TE.2 | P | | |
| l BLACKSTONE RE PARTNERS VI.TE.2-NQ | P | | |
| m BLACKSTONE RE PARTNERS X.F | P | | |
| n BREP VII.F | P | | |
| o BREP VII.F (AV-LH.4) | P | | |

| (e) Gross sales price | (f) Depreciation allowed (or allowable) | (g) Cost or other basis plus expense of sale | (h) Gain or (loss) (e) plus (f) minus (g) |
|-----------------------|--|---|--|
| a | | | 0. |
| b | | | 0. |
| c | | | 0. |
| d | | | 0. |
| e | | | 0. |
| f | | | 0. |
| g | | | 36,746. |
| h | | | -530,697. |
| i | | | 94,702. |
| j | | | -26,882. |
| k | | | -1,179. |
| l | | | -666. |
| m | | | -10. |
| n | | | 239. |
| o | | | 398. |

| Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69 | | | (l) Losses (from col. (h)) Gains (excess of col. (h) gain over col. (k), but not less than "-0-") |
|---|--------------------------------------|---|---|
| (i) F.M.V. as of 12/31/69 | (j) Adjusted basis as of 12/31/69 | (k) Excess of col. (i) over col. (j), if any | |
| a | | | 0. |
| b | | | 0. |
| c | | | 0. |
| d | | | 0. |
| e | | | 0. |
| f | | | 0. |
| g | | | 36,746. |
| h | | | -530,697. |
| i | | | 94,702. |
| j | | | -26,882. |
| k | | | -1,179. |
| l | | | -666. |
| m | | | -10. |
| n | | | 239. |
| o | | | 398. |

| | | |
|---|---|--|
| 2 Capital gain net income or (net capital loss) { If gain, also enter in Part I, line 7 If (loss), enter "-0-" in Part I, line 7 } | 2 | |
| 3 Net short-term capital gain or (loss) as defined in sections 1222(5) and (6): If gain, also enter in Part I, line 8, column (c). If (loss), enter "-0-" in Part I, line 8 | 3 | |

Part IV Capital Gains and Losses for Tax on Investment Income

| (a) List and describe the kind(s) of property sold, e.g., real estate, 2-story brick warehouse; or common stock, 200 shs. MLC Co. | (b) How acquired P - Purchase D - Donation | (c) Date acquired (mo., day, yr.) | (d) Date sold (mo., day, yr.) |
|---|--|--------------------------------------|----------------------------------|
| 1a BREP VII.F-NQ (AV-LH.3) | P | | |
| b BREP VIII.F | P | | |
| c BREP VIII.F (AIV REIT) | P | | |
| d BREP VIII.F (AV-LH) | P | | |
| e BREP VIII.F (AV-LH.2) | P | | |
| f BREP VIII.F (AV-LH.3) | P | | |
| g BREP VIII.F (AV-LH.4) | P | | |
| h BREP VIII.F-NQ (AV-LH.2) | P | | |
| i BREP VIII.F-NQ (AV-LH.4) | P | | |
| j DETROIT VENTURE PARTNERS | P | | |
| k ENERGY CAPITAL TE-L DIRECT | P | | |
| l ENERGY CAPITAL TE-L INDIRECT | P | | |
| m FORTRESS CREDIT OPPORTUNITIES FUND (B) | P | | |
| n FPA APARTMENT OPPORTUNITY FUND V-A | P | | |
| o FPA APARTMENT OPPORTUNITY FUND VI A | P | | |

| (e) Gross sales price | (f) Depreciation allowed (or allowable) | (g) Cost or other basis plus expense of sale | (h) Gain or (loss) (e) plus (f) minus (g) |
|-----------------------|--|---|--|
| a | | | 20,126. |
| b | | | 2,305. |
| c | | | -625. |
| d | | | -2,161. |
| e | | | -21. |
| f | | | 58. |
| g | | | 7,983. |
| h | | | 1,275. |
| i | | | 9,623. |
| j | | | 18,775. |
| k | | | 73,738. |
| l | | | 491. |
| m | | | 155,991. |
| n | | | 14,053. |
| o | | | 503,255. |

Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69

| (i) F.M.V. as of 12/31/69 | (j) Adjusted basis as of 12/31/69 | (k) Excess of col. (i) over col. (j), if any | (l) Losses (from col. (h)) Gains (excess of col. (h) gain over col. (k), but not less than "-0-") |
|---------------------------|--------------------------------------|---|---|
| a | | | 20,126. |
| b | | | 2,305. |
| c | | | -625. |
| d | | | -2,161. |
| e | | | -21. |
| f | | | 58. |
| g | | | 7,983. |
| h | | | 1,275. |
| i | | | 9,623. |
| j | | | 18,775. |
| k | | | 73,738. |
| l | | | 491. |
| m | | | 155,991. |
| n | | | 14,053. |
| o | | | 503,255. |

| | | |
|---|---|--|
| 2 Capital gain net income or (net capital loss) { If gain, also enter in Part I, line 7 If (loss), enter "-0-" in Part I, line 7 } | 2 | |
| 3 Net short-term capital gain or (loss) as defined in sections 1222(5) and (6): If gain, also enter in Part I, line 8, column (c). If (loss), enter "-0-" in Part I, line 8 | 3 | |

Part IV Capital Gains and Losses for Tax on Investment Income

| (a) List and describe the kind(s) of property sold, e.g., real estate, 2-story brick warehouse; or common stock, 200 shs. MLC Co. | (b) How acquired P - Purchase D - Donation | (c) Date acquired (mo., day, yr.) | (d) Date sold (mo., day, yr.) |
|---|--|--------------------------------------|----------------------------------|
| 1a FPA APARTMENT OPPORTUNITY FUND VII-A | P | | |
| b ILLUMEN CAPITAL II | P | | |
| c KINDERHOOK CAPITAL FUND IV-B LP | P | | |
| d MAXIMUM PRIVATE GROWTH FUND | P | | |
| e METROPOLITAN RE PARTNERS INTERNATIONAL IV | P | | |
| f NEW MOUNTAIN PARTNERS III | P | | |
| g PRAIRIE CAPITAL V | P | | |
| h SCULPTOR REAL ESTATE PARALLEL FUND III A | P | | |
| i TFG HEDGE FUND II LLC | P | | |
| j TFG WAKKR 2012 FUND | P | | |
| k THOMA BRAVO FUND XIII-A LP | P | | |
| l TRIDENT V LP | P | | |
| m ACADIAN EMERGING MARKETS SMALL CAP EQUITY FUND | P | | |
| n AETHER REAL ASSETS I LP | P | | |
| o AIO V AIV LP | P | | |

| (e) Gross sales price | (f) Depreciation allowed (or allowable) | (g) Cost or other basis plus expense of sale | (h) Gain or (loss) (e) plus (f) minus (g) |
|-----------------------|--|---|--|
| a | | | 90,394. |
| b | | | -2,350. |
| c | | | 418,309. |
| d | | | 6,379,212. |
| e | | | -6,666. |
| f | | | 2,068. |
| g | | | -344. |
| h | | | -5,005. |
| i | | | 4,569,254. |
| j | | | 1,741,568. |
| k | | | 158,223. |
| l | | | 118,724. |
| m | | | -125,791. |
| n | | | 22,176. |
| o | | | -2,287. |

Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69

| (i) F.M.V. as of 12/31/69 | (j) Adjusted basis as of 12/31/69 | (k) Excess of col. (i) over col. (j), if any | (l) Losses (from col. (h)) Gains (excess of col. (h) gain over col. (k), but not less than "-0-") |
|---------------------------|--------------------------------------|---|---|
| a | | | 90,394. |
| b | | | -2,350. |
| c | | | 418,309. |
| d | | | 6,379,212. |
| e | | | -6,666. |
| f | | | 2,068. |
| g | | | -344. |
| h | | | -5,005. |
| i | | | 4,569,254. |
| j | | | 1,741,568. |
| k | | | 158,223. |
| l | | | 118,724. |
| m | | | -125,791. |
| n | | | 22,176. |
| o | | | -2,287. |

| | | |
|---|---|--|
| 2 Capital gain net income or (net capital loss) { If gain, also enter in Part I, line 7 If (loss), enter "-0-" in Part I, line 7 } | 2 | |
| 3 Net short-term capital gain or (loss) as defined in sections 1222(5) and (6): If gain, also enter in Part I, line 8, column (c). If (loss), enter "-0-" in Part I, line 8 | 3 | |

Part IV Capital Gains and Losses for Tax on Investment Income

| (a) List and describe the kind(s) of property sold, e.g., real estate, 2-story brick warehouse; or common stock, 200 shs. MLC Co. | (b) How acquired P - Purchase D - Donation | (c) Date acquired (mo., day, yr.) | (d) Date sold (mo., day, yr.) |
|---|--|--------------------------------------|----------------------------------|
| 1a BREP VIII.F (AV-LH.2) | P | | |
| b FORTRESS CREDIT OPPORTUNITIES FUND (B) | P | | |
| c ILLUMEN CAPITAL II | P | | |
| d MAXIMUM PRIVATE GROWTH FUND | P | | |
| e TFG WAKKR 2012 FUND | P | | |
| f THOMA BRAVO XV-A LP | P | | |
| g TRIDENT V LP | P | | |
| h MELLON PUBLICLY TRADED SECURITIES | P | | |
| i SQUARE MILE PARTNERS III TE | P | | |
| j CAPITAL GAINS DIVIDENDS | | | |
| k | | | |
| l | | | |
| m | | | |
| n | | | |
| o | | | |

| (e) Gross sales price | (f) Depreciation allowed (or allowable) | (g) Cost or other basis plus expense of sale | (h) Gain or (loss) (e) plus (f) minus (g) |
|-----------------------|--|---|--|
| a | | | 10. |
| b | | | -58,893. |
| c | | | -1,096. |
| d | | | 251,062. |
| e | | | 981. |
| f | | | 61. |
| g | | | 27. |
| h 109,789,612. | | 118,380,696. | -8,591,084. |
| i | | | -30,544. |
| j 110,563. | | | 110,563. |
| k | | | |
| l | | | |
| m | | | |
| n | | | |
| o | | | |

| Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69 | | | (l) Losses (from col. (h)) Gains (excess of col. (h) gain over col. (k), but not less than "-0-") |
|---|--------------------------------------|---|---|
| (i) F.M.V. as of 12/31/69 | (j) Adjusted basis as of 12/31/69 | (k) Excess of col. (i) over col. (j), if any | |
| a | | | 10. |
| b | | | -58,893. |
| c | | | -1,096. |
| d | | | 251,062. |
| e | | | 981. |
| f | | | 61. |
| g | | | 27. |
| h | | | -8,591,084. |
| i | | | -30,544. |
| j | | | 110,563. |
| k | | | |
| l | | | |
| m | | | |
| n | | | |
| o | | | |

| | | |
|---|---|------------|
| 2 Capital gain net income or (net capital loss) { If gain, also enter in Part I, line 7 If (loss), enter "-0-" in Part I, line 7 } | 2 | 5,416,089. |
| 3 Net short-term capital gain or (loss) as defined in sections 1222(5) and (6): If gain, also enter in Part I, line 8, column (c). If (loss), enter "-0-" in Part I, line 8 | 3 | N/A |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|---|--|--------------------------------------|---|--------------------|
| ALLIED MEDIA PROJECTS F/B/O MOTOR CITY STREET DANCE ACADEMY 4126 3RD AVENUE DETROIT, MI 48201 | | PC | S.E.E.D. PROGRAM | 75,000. |
| ALLIED MEDIA PROJECTS F/B/O MOTOR CITY STREET DANCE ACADEMY 4126 3RD AVENUE DETROIT, MI 48201 | | PC | 2022 GENERAL OPERATING SUPPORT-COVID RELIEF | 10,000. |
| AMERICAN FRIENDS OF ORR SHALOM PO BOX 796 BEIT SHEMESH, ISRAEL | | PC | BEATING THE ODDS GRADUATE PROGRAM | 150,000. |
| AMERICAN JEWISH COMMITTEE 165 EAST 56TH STREET NEW YORK, NY 10022 | | PC | APPEAL FOR HUMAN RELATIONS | 30,000. |
| ANTI-DEFAMATION LEAGUE 823 UNITED NATIONS PLAZA NEW YORK, NY 10158 | | PC | GENERAL OPERATING EXPENSES | 30,000. |
| ARTS & SCRAPS 16135 HARPER AVE DETROIT, MI 48224 | | PC | 2022 GENERAL OPERATING SUPPORT | 16,634. |
| ASSOCIATION OF BLACK FOUNDATION EXECUTIVES (ABFE) 55 EXCHANGE PLACE #401 NEW YORK, NY 10005 | | PC | 2022 MEMBERSHIP | 10,000. |
| ASSOCIATION OF FUNDRAISING PROFESSIONALS-DETROIT CHAPTER 28226 DELTON ST MADISON HEIGHTS, MI 48071 | | PC | NATIONAL PHILANTHROPY DAY | 2,500. |
| BIRTHRIGHT ISRAEL FOUNDATION 33 E 33RD ST. 7TH FLOOR NEW YORK, NY 10016 | | PC | BIRTHRIGHT ISRAEL | 494,000. |
| B'NAI B'RITH HILLEL FOUNDATION AT OSU 46 E 16TH AVE COLUMBUS, OH 43201 | | PC | THE MMF ISRAEL OUTREACH AND ENGAGEMENT INITIATIVE | 17,500. |
| Total from continuation sheets | | | | 14,458,565. |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|---|--|--------------------------------------|---|----------|
| BLACK LEADERS DETROIT 8425 W MCNICHOLS RD DETROIT, MI 48221 | | PC | BIZLOAN ADVISORY AND CONSULTING SUPPORT- GENERAL SUPPORT | 50,000. |
| BOYS & GIRLS CLUBS OF PB COUNTY 800 NORTH POINT PARKWAY WEST PALM BEACH, FL 33407 | | PC | MSF AND MMF ORGANIC GARDENS | 52,863. |
| BRIGHTMOOR ALLIANCE 17421 TELEGRAPH DETROIT, MI 48219 | | PC | AFTERSCHOOL CLUB PROGRAM | 31,500. |
| BRIGHTMOOR ALLIANCE 17421 TELEGRAPH DETROIT, MI 48219 | | PC | URGENT INFANT FORMULA | 50,000. |
| BRIGHTMOOR ALLIANCE 17421 TELEGRAPH DETROIT, MI 48219 | | PC | BRIGHTMOOR TRAUMA HEALING CENTER | 165,550. |
| BRIGHTMOOR ALLIANCE 17421 TELEGRAPH DETROIT, MI 48219 | | PC | 6-A-DAY ONESIES PROGRAM | 48,923. |
| BRIGHTMOOR ALLIANCE 17421 TELEGRAPH DETROIT, MI 48219 | | PC | BRIGHTMOOR UP! | 198,585. |
| BRIGHTMOOR ALLIANCE INC. 17421 TELEGRAPH DETROIT, MI 48219 | | PC | BQI MOBILE DIAPER DISTRIBUTION PROGRAM | 200,180. |
| BRIGHTMOOR ALLIANCE 17421 TELEGRAPH DETROIT, MI 48219 | | PC | SUPPORTING BRIGHTMOOR LEADERS \$1,031,250 OVER FIVE YEARS | 44,893. |
| BRIGHTMOOR ALLIANCE INC. 17421 TELEGRAPH DETROIT, MI 48219 | | PC | BRIGHTMOOR ALLIANCE MISSION: CITY'S HOLIDAY PROGRAM | 10,500. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|--|--|--------------------------------------|--|----------|
| BRILLIANT DETROIT 5675 LARKINS ST DETROIT, MI 48210 | | PC | KID SUCCESS IN BRIGHTMOOR | 150,000. |
| BRILLIANT DETROIT 5675 LARKINS ST DETROIT, MI 48210 | | PC | MIDWIFERY CARE TO DETROIT FAMILIES | 75,000. |
| BRILLIANT DETROIT 5675 LARKINS ST DETROIT, MI 48210 | | PC | DETROIT 0-8 COLLECTIVE IMPACT ALIGNMENT | 50,000. |
| CHAMPION EDUCATION NETWORK 13600 VIRGIL ST DETROIT, MI 48223 | | PC | 2022 PHOTOGRAPHY CAMP COACHING DETROIT FORWARD | 24,962. |
| CHILDREN'S HOSPITAL OF MICHIGAN FOUNDATION 3911 BEAUBIEN ST DETROIT, MI 48201 | | PC | 2023 BEHAVIORAL HEALTH SUMMIT | 3,000. |
| CHILDREN OF THE RISING SUN 19176 NORTHROP DETROIT, MI 48219 | | PC | SUPPORTING BRIGHTMOOR LEADERS | 5,000. |
| CITY YEAR DETROIT 1 FORD PLACE #1F DETROIT, MI 48202 | | PC | GOMPERS ELEMENTARY-MIDDLE SCHOOL TEAM SPONSORSHIP | 100,000. |
| CITY YEAR DETROIT 1 FORD PLACE #1F DETROIT, MI 48202 | | PC | WHOLE SCHOOL WHOLE CHILD: K-8 LITERACY PROGRAM SUPPORT | 184,000. |
| CITY YEAR DETROIT 1 FORD PLACE #1F DETROIT, MI 48202 | | PC | SUPPORTING BRIGHTMOOR LEADERS | 5,000. |
| CLASS ACT DETROIT 20501 LIVERNOIS AVE, PO BOX 21827 DETROIT, MI 48221-9998 | | PC | HIP HOP ED - SBL | 5,000. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|---|--|--------------------------------------|---|----------|
| COACHING DETROIT FORWARD 1514 WASHINGTON BLVD STE 203 DETROIT, MI 48226 | | PC | 2022 GENERAL OPERATING SUPPORT | 10,000. |
| COLLEGE FOR CREATIVE STUDIES 201 E. KIRBY DETROIT, MI 48202-4048 | | PC | BRIGHTMOOR NEIGHBORHOOD ARTS | 103,129. |
| COLLEGE FOR CREATIVE STUDIES 201 E. KIRBY DETROIT, MI 48202-4048 | | PC | BRIGHTMOOR AFTER SCHOOL ARTS | 6,871. |
| COMMUNITY FOUNDATION FOR SOUTHEAST MICHIGAN 333 WEST FORT STREET DETROIT, MI 48226 | | PC | EXECUTIVE DIRECTOR FUND | 50,000. |
| COMMUNITY FOUNDATION FOR SOUTHEAST MICHIGAN 333 WEST FORT STREET DETROIT, MI 48226 | | PC | FISHER - CUMMINGS FAMILY FUND | 100,000. |
| COMMUNITY FOUNDATION FOR SOUTHEAST MICHIGAN 333 WEST FORT STREET DETROIT, MI 48226 | | PC | MARJORIE M. FISHER FUND | 400,000. |
| COMMUNITY FOUNDATION FOR SOUTHEAST MICHIGAN 333 WEST FORT STREET DETROIT, MI 48226 | | PC | PHILLIP WM FISHER FAMILY FUND | 200,000. |
| COMMUNITY FOUNDATION OF SOUTHEAST MICHIGAN 333 WEST FORT STREET DETROIT, MI 48226 | | PC | AMANDA FISHER FUND | 50,000. |
| COMMUNITY FOUNDATION OF SOUTHEAST MICHIGAN 333 WEST FORT STREET DETROIT, MI 48226 | | PC | ALISSANDRA ARONOW DONOR ADVISED FUND | 50,000. |
| COMMUNITY FOUNDATION OF SOUTHEAST MICHIGAN 333 WEST FORT STREET DETROIT, MI 48226 | | PC | ANDREW SHERMAN DONOR ADVISED FUND | 50,000. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|--|--|--------------------------------------|--|----------|
| COMMUNITY FOUNDATION OF SOUTHEAST MICHIGAN 333 WEST FORT STREET DETROIT, MI 48226 | | PC | FISHER FAMILY MATCHING GRANT | 32,101. |
| COMMUNITY FOUNDATION FOR PALM BEACH & MARTIN COUNTIES 700 SOUTH DIXIE HWY STE 200 WEST PALM BEACH, FL 33401 | | PC | CUMMINGS RAFFERTY FAMILY FUND | 50,000. |
| COMMUNITY FOUNDATION FOR PALM BEACH & MARTIN COUNTIES 700 SOUTH DIXIE HWY STE 200 WEST PALM BEACH, FL 33401 | | PC | FISHER - CUMMINGS FAMILY FUND | 300,000. |
| COMMUNITY FOUNDATION FOR PALM BEACH & MARTIN COUNTIES 700 SOUTH DIXIE HWY STE 200 WEST PALM BEACH, FL 33401 | | PC | ARTS & CULTURE REGRANT FUND | 367,919. |
| COMMUNITY FOUNDATION FOR PALM BEACH & MARTIN COUNTIES 700 SOUTH DIXIE HWY STE 200 WEST PALM BEACH, FL 33401 | | PC | ARTS & CULTURE REGRANT FUND | 99,815. |
| CONGREGATION BETH CHABAD 278 MACK AVE DETROIT, MI 48201 | | PC | 2022 EX-PAT HOMECOMING | 2,000. |
| CONNECT DETROIT 613 ABBOTT ST., SUITE 410 DETROIT, MI 48226-2135 | | PC | MSF PREFERRED LIST | 100,000. |
| COUNCIL OF MICHIGAN FOUNDATIONS ONE SOUTH HARBOR AVE GRAND HAVEN, MI 49417 | | PC | 2022 MEMBERSHIP | 16,300. |
| COUNCIL OF MICHIGAN FOUNDATIONS ONE SOUTH HARBOR AVE GRAND HAVEN, MI 49417 | | PC | SUPPORT FOR THE OFFICE OF THE FOUNDATION LIAISON | 10,000. |
| COUNCIL OF MICHIGAN FOUNDATIONS ONE SOUTH HARBOR AVE GRAND HAVEN, MI 49417 | | PC | OFL VIDEO | 1,500. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|--|--|--------------------------------------|---|---------|
| COUNCIL OF MICHIGAN FOUNDATIONS ONE SOUTH HARBOR AVE GRAND HAVEN, MI 49417 | | PC | COLLABORATIVE MANAGER | 28,000. |
| COUNCIL OF MICHIGAN FOUNDATIONS ONE SOUTH HARBOR AVE GRAND HAVEN, MI 49417 | | PC | OFL RESEARCH AND OPP FUND | 25,000. |
| COUNCIL ON FOUNDATIONS 2121 CRYSTAL DRIVE SUITE 700 ARLINGTON, TX 22202 | | PC | 2023 MEMBERSHIP DUES | 15,000. |
| CULTURE SOURCE 3434 RUSSELL STREET DETROIT, MI 48207 | | PC | EMCARTS ACQUISITION SUPPORT | 25,000. |
| CULTURE SOURCE 3434 RUSSELL STREET DETROIT, MI 48207 | | PC | EMCARTS ACQUISITION SUPPORT | 25,000. |
| DETROIT COMMUNITY LOAN FUND 3031 W GRAND BLVD STE 505 DETROIT, MI 48202 | | PC | BIZLOAN FUND REIMAGINED PROGRAM | 50,000. |
| DETROIT INSTITUTE OF ARTS 5200 WOODWARD AVE DETROIT, MI 48202 | | PC | DIA TEEN ARTS COUNCIL SUSTAINABILITY | 13,448. |
| DETROIT OPERA 1526 BROADWAY ST DETROIT, MI 48226 | | PC | 2022-2023 GENERAL OPERATIONS | 50,000. |
| DETROIT OPERA 1526 BROADWAY ST DETROIT, MI 48226 | | PC | 2022 GENERAL OPERATING SUPPORT | 10,000. |
| DETROIT OPERA 1526 BROADWAY ST DETROIT, MI 48226 | | PC | STORYBOOK OPERA 2022-2024 | 40,000. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|---|--|--------------------------------------|--|----------|
| DETROIT PARENT NETWORK 726 LOTHROP ROAD DETROIT, MI 48202 | | PC | EARLY CHILDHOOD ENRICHMENT AND ENGAGEMENT BQI FIELD TRIPS | 100,000. |
| DETROIT SYMPHONY ORCHESTRA 3711 WOODWARD AVENUE DETROIT, MI 48201 | | PC | BLUEPRINT 2.0 | 500,000. |
| DETROIT SYMPHONY ORCHESTRA 3711 WOODWARD AVENUE DETROIT, MI 48201 | | PC | ANNUAL SUPPORT 2022-2023 | 100,000. |
| DETROIT SYMPHONY ORCHESTRA 3711 WOODWARD AVENUE DETROIT, MI 48201 | | PC | THE WHOLE CHILD | 100,000. |
| DEVELOPMENT CENTERS, INC. 17421 TELEGRAPH DETROIT, MI 48219 | | PC | BRIGHTMOOR CHILDCARE QUALITY INITIATIVE | 269,096. |
| DEVELOPMENT CENTERS, INC. 17421 TELEGRAPH DETROIT, MI 48219 | | PC | SUPPORTING BRIGHTMOOR LEADERS \$1,031,250 OVER 5 YEARS | 42,390. |
| DEVELOPMENT CENTERS, INC. 17421 TELEGRAPH DETROIT, MI 48219 | | PC | NORTHROP CELEBRATION | 3,068. |
| DEVELOPMENT CENTERS, INC. 17421 TELEGRAPH DETROIT, MI 48219 | | PC | CRS PEER-TO-PEER | 88,878. |
| DEVELOPMENT CENTERS, INC. 17421 TELEGRAPH DETROIT, MI 48219 | | PC | BQI HOLIDAY PROGRAM | 20,000. |
| DEVELOPMENT CENTERS, INC. 17421 TELEGRAPH DETROIT, MI 48219 | | PC | BQI PROGRAM EXPANSIONS | 500,000. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|--|--|--------------------------------------|---|----------|
| DEVELOPMENT KINGDOMS IN DIFFERENT STAGES (K.I.D.S.) 19321 W CHICAGO ST #107 DETROIT, MI 48228 | | PC | THE ART MAKERS OF DEVELOPING KIDS | 25,000. |
| EISENHOWER DANCE ENSEMBLE 2155 COLE STREET BIRMINGHAM, MI 48009 | | PC | LET'S DANCE | 50,000. |
| EVERYBODY READY 13305 REECK CT SUITE 120 SOUTHGATE, MI 48195 | | PC | BRIGHTMOOR CHILD CARE QUALITY INITIATIVE SCHOLARSHIPS | 316,700. |
| EVERYBODY READY 13305 REECK CT SUITE 120 SOUTHGATE, MI 48195 | | PC | HOPE STARTS HERE-CONTENT SPECIALIST | 35,810. |
| FAITH'S PLACE CENTER FOR THE ARTS EDUCATION 2508 N. AUSTRALIAN AVENUE WEST PALM BEACH, FL 33407 | | PC | 2022 GENERAL OPERATING SUPPORT | 16,634. |
| FAR CONSERVATORY OF THERAPEUTIC AND PERFORMING ART 1669 W MAPLE RD BIRMINGHAM, MI 48009 | | PC | EXPRESSIVE ENGAGEMENT - DANCE/MOVEMENT THERAPY | 31,050. |
| FORGOTTEN HARVEST 21800 GREENFIELD OAK PARK, MI 48237 | | PC | HEALTHY FOOD HEALTHY BRIGHTMOOR | 100,000. |
| FOUNDATION FOR DETROIT'S FUTURE (F/K/A CFSEM-DIA ART TRUST) 333 WEST FORT STREET DETROIT, MI 48226 | | PC | DIA SETTLEMENT | 125,000. |
| FRESH AIR SOCIETY/TAMARACK CAMPS 6735 TELEGRAPH RD #380 BLOOMFIELD HILLS, MI 48301 | | PC | J-AIR JEWISH ARTIST IN RESIDENCE PROGRAM | 75,000. |
| FRIENDS OF UNITED HATZALAH 208 EAST 51ST STREET, SUITE 303 NEW YORK, NY 10022 | | PC | UKRAINE EMERGENCY NEEDS | 100,000. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|---|--|--------------------------------------|---|----------|
| GLEANERS COMMUNITY FOOD BANK 2131 BEAUFIT DETROIT, MI 48207 | | PC | 2022 CLIENT CHOICE FOOD PANTRY | 203,100. |
| GLOBAL IMPACT INVESTING NETWORK ONE BATTERY PARK PLAZA #202 NEW YORK, NY 10004 | | PC | 2022 MEMBERSHIP | 4,950. |
| GRAND VALLEY STATE UNIVERSITY 201 FRONT AVENUE SW GRAND RAPIDS, MI 49504 | | PC | TFR ISSUE ON IMPACT INVESTING | 20,000. |
| GRANTMAKERS FOR EDUCATION 400 SE 103RD DR #33348 PORTLAND, OR 97216 | | PC | 2022 MEMBERSHIP DUES | 4,200. |
| GRANTMAKERS FOR EDUCATION 400 SE 103RD DR #33348 PORTLAND, OR 97216 | | PC | 2022 ANNUAL CONFERENCE | 5,000. |
| GRANTMAKERS FOR EFFECTIVE ORGANIZATIONS 1310 L STREET NW 650 WASHINGTON, DC 20005 | | PC | 2022 MEMBERSHIP DUES | 7,390. |
| HERITAGE WORKS 4444 2ND AVE DETROIT, MI 48201 | | PC | DRUM ROLL | 75,000. |
| ILLINOIS FINANCE FUND - HOPE STARTS HERE DETROIT 3011 W GRAND BLVD FISHER BLDG DETROIT, MI 48202 | | PC | PATHWAYS TO A STRONGER EC WORKFORCE, HOPE STARTS HERE | 168,000. |
| IMPACT ISRAEL 4340 EAST-WEST HIGHWAY #202 BETHESDA, MD 20814 | | PC | ISRAELITE YOUNG WOMEN'S LEADERSHIP PROGRAM | 50,000. |
| INDEPENDENT SECTOR PO BOX 5007 MERRIFIELD, VA 22116 | | PC | 2022/23 MEMBERSHIP DUES | 11,000. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|---|--|--------------------------------------|---|----------|
| INSIDEOUT LITERARY ARTS PROJECT 2111 WOODWARD AVE DETROIT, MI 48201 | | PC | WORLD TRAVELERS PROGRAM | 54,000. |
| INSIDEOUT LITERARY ARTS PROJECT 2111 WOODWARD AVE DETROIT, MI 48201 | | PC | 2022 GENERAL OPERATING SUPPORT | 10,000. |
| INSIDEOUT LITERARY ARTS PROJECT 2111 WOODWARD AVE DETROIT, MI 48201 | | PC | 2022 GENERAL OPERATING SUPPORT | 16,634. |
| JEWISH AGENCY FOR ISRAEL - NORTH AMERICAN COUNCIL 633 THIRD AVE NEW YORK, NY 10017 | | PC | HEARTBEATS: EARLY CHILDHOOD INTERVENTION FOR ISRAELI FAMILIES | 151,979. |
| JEWISH AGENCY FOR ISRAEL - NORTH AMERICAN COUNCIL 633 THIRD AVE NEW YORK, NY 10017 | | PC | MASA ISRAEL TEACHING FELLOWS | 250,000. |
| JEWISH AGENCY FOR ISRAEL - NORTH AMERICAN COUNCIL 633 THIRD AVE NEW YORK, NY 10017 | | PC | KIRYAT YEARIM YOUTH VILLAGE- GENERAL OPERATING SUPPORT | 220,000. |
| JEWISH AGENCY FOR ISRAEL - NORTH AMERICAN COUNCIL 633 THIRD AVE NEW YORK, NY 10017 | | PC | ALMA PRE-ARMY LEADERSHIP ACADEMY | 21,934. |
| JEWISH AGENCY FOR ISRAEL - NORTH AMERICAN COUNCIL 633 THIRD AVE NEW YORK, NY 10017 | | PC | UKRAINE EMERGENCY FUNDS | 200,000. |
| JEWISH AGENCY FOR ISRAEL - NORTH AMERICAN COUNCIL 633 THIRD AVE NEW YORK, NY 10017 | | PC | SPARK IL | 200,000. |
| JEWISH COMMUNITY CENTER 2935 BIRCH HOLLOW DR ANN ARBOR, MI 48108 | | PC | PJ LIBRARY IN DETROIT | 125,000. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|---|--|--------------------------------------|--|------------|
| JEWISH COMMUNITY CENTER 2935 BIRCH HOLLOW DR ANN ARBOR, MI 48108 | | PC | JCC DAY CAMP SCHLICHIM AND JEWISH VALUES | 26,000. |
| JEWISH FEDERATION OF METRO DETROIT (UJF) 6735 TELEGRAPH BLOOMFIELD HILLS, MI 48303 | | PC | DAVID F. AND ELLEN J. SHERMAN FAMILY PHILANTHROPY FUND | 50,000. |
| JEWISH FEDERATION OF METRO DETROIT 6735 TELEGRAPH BLOOMFIELD HILLS, MI 48303 | | PC | JLIVE | 125,000. |
| JEWISH FEDERATION OF METRO DETROIT 6735 TELEGRAPH BLOOMFIELD HILLS, MI 48303 | | PC | KEEPING OUR COMMUNITY SAFE | 100,000. |
| JEWISH FEDERATION OF METRO DETROIT 6735 TELEGRAPH BLOOMFIELD HILLS, MI 48303 | | PC | 2022 CONTRIBUTION | 1,250,000. |
| JEWISH FEDERATION OF METRO DETROIT 6735 TELEGRAPH BLOOMFIELD HILLS, MI 48303 | | PC | 2023 CONTRIBUTION | 175,000. |
| JEWISH FEDERATION OF PALM BEACH COUNTY 1 HARVARD CIRCLE, SUITE 100 WEST PALM BEACH, FL 33409 | | PC | PJ LIBRARY IN PALM BEACH | 100,000. |
| JEWISH FEDERATIONS OF NORTH AMERICA 25 BROADWAY NEW YORK, NY 10004 | | PC | ENP SPACE-SCHOOL PERFORMANCE AND COMMUNITY EMPOWERMENT | 125,000. |
| JEWISH FEDERATIONS OF NORTH AMERICA 25 BROADWAY NEW YORK, NY 10004 | | PC | FISHER FLIGHT 13 | 64,950. |
| JEWISH FEDERATIONS OF NORTH AMERICA 25 BROADWAY NEW YORK, NY 10004 | | PC | FISHER FLIGHT 14 | 147,500. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|--|--|--------------------------------------|--|----------|
| JEWISH FUNDERS NETWORK 150 WEST 30TH STREET NEW YORK, NY 10001 | | PC | DONOR-ADVISED FUND ISRAEL | 150,000. |
| JEWISH FUNDERS NETWORK 150 WEST 30TH STREET NEW YORK, NY 10001 | | PC | LEARNLING LAB & FACILITATOR TRAINING | 10,000. |
| JEWISH FUNDERS NETWORK 150 WEST 30TH STREET NEW YORK, NY 10001 | | PC | 2022 INTERNATIONAL CONFERENCE | 20,000. |
| JEWISH FUNDERS NETWORK 150 WEST 30TH STREET NEW YORK, NY 10001 | | PC | HONEYCOMB - JEWISH YOUTH PHILANTHROPY | 125,000. |
| JEWISH FUNDERS NETWORK 150 WEST 30TH STREET NEW YORK, NY 10001 | | PC | YOUTH VILLAGE GIVING CIRCLE | 40,000. |
| JEWISH FUNDERS NETWORK 150 WEST 30TH STREET NEW YORK, NY 10001 | | PC | 2023 MEMBERSHIP DUES | 20,000. |
| JPRO NETWORK 25 BROADWAY #1700 NEW YORK, NY 10004 | | PC | 2023 MEMBERSHIP DUES | 1,000. |
| LELAND COMMUNITY AFFAIRS 22420 FENKELL ST DETROIT, MI 48223 | | PC | SUPPORTING BRIGHTMOOR LEADERS | 5,000. |
| LIGHTHOUSE ART CENTER 373 TEQUESTA DR TEQUESTA, FL 33469 | | PC | 2022 GENERAL OPERATING SUPPORT | 16,634. |
| LIVING ARTS 8701 W VERNOR DETROIT, MI 48209 | | PC | 2022 GENERAL OPERATING SUPPORT | 10,000. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|--|--|--------------------------------------|---|----------|
| LIVING ARTS 8701 W VERNOR DETROIT, MI 48209 | | PC | STRENGTHENING DETROIT EDUCATORS, FAMILIES, AND YOUNG CHILDREN | 100,000. |
| LIVING ARTS 8701 W VERNOR DETROIT, MI 48209 | | PC | 2022 GENERAL OPERATING SUPPORT | 16,634. |
| LORD'S PLACE, THE PO BOX 3265 WEST PALM BEACH, FL 33402 | | PC | GENERAL OPERATING SUPPORT | 72,500. |
| MARYLAND PHILANTHROPY 1600 W 14TH ST #700 BALTIMORE, MD 21211 | | PC | BIZLOAN ADVISORY AND CONSULTING SUPPORT | 25,000. |
| MICHIGAN LEAGUE FOR PUBLIC POLICY 1223 TURNER RD SUITE G1 LANSING, MI 48906 | | PC | 2022 MLPP ANNUAL MEETING AND POLICY FORUM | 5,000. |
| MICHIGAN LEAGUE FOR PUBLIC POLICY 1223 TURNER RD SUITE G1 LANSING, MI 48906 | | PC | KIDS COUNT IN MI | 100,000. |
| MICHIGAN STATE UNIVERSITY 3408 WOODWARD AVE DETROIT, MI 48201 | | PC | CMS-D EARLY CHILDHOOD MUSIC | 80,000. |
| MICHIGAN NONPROFIT ASSOCIATION 1048 PIERPONT DRIVE LANSING, MI 48912 | | PC | 2022 MEMBERSHIP DUES | 11,100. |
| MICHIGAN NONPROFIT ASSOCIATION 1048 PIERPONT DRIVE LANSING, MI 48912 | | PC | NEIGHBORHOOD VITALITY INDEX | 25,000. |
| MISSION INVESTORS EXCHANGE 2440 WEST EL CAMINO REAL #300 MOUNTAIN VIEW, CA 94040 | | PC | 2023 MEMBERSHIP DUES | 15,000. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|---|--|--------------------------------------|---|---------|
| MOISHE HOUSE 441 SAXONY ROAD BARN 2 ENCINITAS, CA 92024 | | PC | STRENGTHENING LOCAL JEWISH LIFE THROUGH PEER-LED, PLURALISTIC COMMUNITY BUILDING FOR YOUNG ADULTS | 25,000. |
| MOSAIC YOUTH THEATRE 2251 ANTIETAM AVENUE DETROIT, MI 48207 | | PC | 2022 GENERAL OPERATING SUPPORT | 10,000. |
| MOSAIC YOUTH THEATRE 2251 ANTIETAM AVENUE DETROIT, MI 48207 | | PC | BRIGHTMOOR MOSAIC DISCOVER & EXPLORE RESIDENCIES | 65,420. |
| MOTOWN HISTORICAL MUSEUM 2648 WEST GRAND BLVD DETROIT, MI 48208 | | PC | STAFFING CAPACITY | 15,000. |
| MOTOWN HISTORICAL MUSEUM 2648 WEST GRAND BLVD DETROIT, MI 48208 | | PC | HITSVILLE NEXT SUMMER PROGRAMS | 50,000. |
| MOTOWN HISTORICAL MUSEUM 2648 WEST GRAND BLVD DETROIT, MI 48208 | | PC | 2022 GENERAL OPERATING SUPPORT | 10,000. |
| MUSEUM OF AFRICAN AMERICAN HISTORY 315 E WARREN AVE DETROIT, MI 48201 | | PC | EXPANSION OF CAMP AFRICA YOUTH PROGRAM | 50,000. |
| NATIONAL CENTER FOR FAMILY PHILANTHROPY 1101 CONNECTICUT WASHINGTON, DC 20001 | | PC | 2022 ANNUAL CONFERENCE | 10,000. |
| NATIONAL CENTER FOR FAMILY PHILANTHROPY 1101 CONNECTICUT WASHINGTON, DC 20001 | | PC | LEADERSHIP CIRCLE 2022 | 10,000. |
| NATIONAL COMMITTEE FOR RESPONSIVE PHILANTHROPY 1331 H ST NW SUITE 200 WASHINGTON, DC 20005 | | PC | 2023 MEMBERSHIP | 4,500. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|---|--|--------------------------------------|--|----------|
| NEW DETROIT 535 GRISWOLD #2500 DETROIT, MI 48226 | | PC | DR. DAVID CAMPT AND THE WHITE ALLY TOOLKIT | 25,000. |
| OHIO STATE UNIVERSITY FOUNDATION 364 W LANE AVE COLUMBUS , OH 43201 | | PC | ATHLETIC ADVANCEMENT FUND | 1,000. |
| OLD NEWSBOYS' GOODFELLOW FUND PO BOX 44444 DETROIT, MI 48244 | | PC | GENERAL OPERATING EXPENSES | 1,000. |
| OPENDOR MEDIA (IMAGINATION PRODUCTIONS) 11110 W OAKLAND PARK BLVD #288 SUNRISE, FL 33351 | | PC | UNPACKED FOR EDUCATORS DIGITAL RESOURCE | 100,000. |
| ORT AMERICA 75 MAIDEN LANE 10TH FL NEW YORK, NY 10038 | | PC | YOUNIVERSITY ROBOTICS | 71,000. |
| WORLD ORT INC 75 MAIDEN LANE, 10TH FLOOR NEW YORK, NY 10038 | | PC | UKRAINE EMERGENCY NEEDS | 100,000. |
| PEAK GRANTMAKING 1666 K STREET NW #440 WASHINGTON, DC 20006 | | PC | 2023 MEMBERSHIP DUES | 3,000. |
| PALM BEACH COUNTY FOOD BANK 701 BOUTWELL ROAD, A-2 LAKE WORTH BEACH, FL 33461 | | PC | GENERAL SUPPORT | 72,500. |
| PEWABIC SOCIETY 10125 EAST JEFFERSON DETROIT, MI 48214 | | PC | CERAMIC ARTS APPRENTICESHIP PROGRAM | 25,000. |
| REGENTS OF THE UNIVERSITY OF MICHIGAN 500 S. STATE STREET ANN ARBOR, MI 48109 | | PC | YOUTH POLICY LAB MICHIGAN DATA & POLICY FELLOWSHIP | 208,027. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|---|--|--------------------------------------|---|----------|
| SALVATION ARMY-SE MICHIGAN CHAPTER 16130 NORTHLAND DRIVE SOUTHFIELD, MI 48075 | | PC | GENERAL OPERATING EXPENSES | 5,000. |
| SPHINX ORGANIZATION 400 RENAISSANCE CENTER DETROIT, MI 48243 | | PC | SPHINX OVERTURE-BRIGHTMOOR | 125,000. |
| SPHINX ORGANIZATION 400 RENAISSANCE CENTER DETROIT, MI 48243 | | PC | BRIGHTMOOR VIOLIN INSTRUCTION AND SUMMER CAMP-MSF PREFERRED | 5,000. |
| SPHINX ORGANIZATION 400 RENAISSANCE CENTER DETROIT, MI 48243 | | PC | 2022 SUMMER CAMP TRANSPORTATION | 8,000. |
| TAKE STOCK IN CHILDREN 1896 PALM BEACH LAKES BLVD #103 PALM BEACH, FL 33409 | | PC | SCHOLARSHIPS FOR BGCPCB STUDENTS-MSF PREFERRED | 100,000. |
| THE CENTER FOR MICHIGAN 220 W MICHIGAN AVE YPSILANTI, MI 48197 | | PC | BRIDGE BUILDERS LEADERSHIP CIRCLE | 2,500. |
| THE HEAT AND WARMTH FUND (THAW) 607 SHELBY DETROIT, MI 48226 | | PC | BRIGHTMOOR UTILITY ASSISTANCE AND EFFICIENCY PROGRAM | 150,000. |
| THE HEAT AND WARMTH FUND (THAW) 607 SHELBY DETROIT, MI 48226 | | PC | BRIGHTMOOR UTILITY ASSISTANCE AND EFFICIENCY PROGRAM-SUPPLEMENTAL FUNDING | 50,000. |
| THE IMPACT SOCIETY 135 MADISON AVE 8TH FL NEW YORK, NY 10016 | | PC | 2022 CONFERENCE SPONSORSHIP | 25,000. |
| THE SHABBAT PROJECT INC. 79 MADISON AVE NEW YORK, NY 10016 | | PC | YOUNG ADULT ENGAGEMENT IN PALM BEACH | 35,000. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|--|--|--------------------------------------|--|----------|
| THE SHABBAT PROJECT INC. 79 MADISON AVE NEW YORK, NY 10016 | | PC | YOUNG ADULT ENGAGEMENT IN DETROIT | 35,000. |
| THE WELL 5725 WALNUT LAKE ROAD WEST BLOOMFIELD, MI 48323 | | PC | SUKKOT SOUNDS FESTIVAL 2022 | 4,000. |
| TONIIC INSTITUTE 47 KEARNY ST., SUITE 600 SAN FRANCISCO, CA 94108 | | PC | 2023 MEMBERSHIP | 8,000. |
| UNITED JEWISH FOUNDATION 6735 TELEGRAPH BLOOMFIELD HILLS, MI 48303 | | PC | PHILLIP WM. FISHER SUPPORT FOUNDATION | 200,000. |
| UNITED JEWISH FOUNDATION 6735 TELEGRAPH BLOOMFIELD HILLS, MI 48303 | | PC | JANE & LARRY SHERMAN FAMILY FOUNDATION | 400,000. |
| UNITED NEGRO COLLEGE FUND 3031 W GRAND BLVD DETROIT, MI 48202 | | PC | GENERAL OPERATING EXPENSES | 5,000. |
| UNITED WAY FOR SOUTHEASTERN MICHIGAN 660 WOODWARD AVE #300 DETROIT, MI 48226 | | PC | GENERAL OPERATING EXPENSES | 75,000. |
| UNIVERSITY OF MICHIGAN HILLEL 1429 HILL ST ANN ARBOR, MI 48104 | | PC | ISRAEL IMMERSIVE EXPERIENCE COORDINATOR | 75,000. |
| WELLSPRING 16742 LAMPHERE ST DETROIT, MI 48219 | | PC | BRIGHTMOOR LITERACY EXPANSION | 120,000. |
| WELLSPRING 16742 LAMPHERE ST DETROIT, MI 48219 | | PC | FACILITY ANALYSIS PHASE II | 27,000. |
| Total from continuation sheets | | | | |

Part XIV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

| Recipient Name and address (home or business) | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
|---|--|--------------------------------------|---|---------|
| WELLSPRING 16742 LAMPHERE ST DETROIT, MI 48219 | | PC | SBL-CHRISTIAN COMMUNITY DEVELOPMENT | 5,000. |
| WELLSPRING 16742 LAMPHERE ST DETROIT, MI 48219 | | PC | LIFT AS WE CLIMB | 65,000. |
| YAD EZRA 2850 W 11 MILE RD BERKLEY, MI 48072 | | PC | STAYING CONNECTED TO CELEBRATE THE JEWISH HOLIDAYS | 65,000. |
| YMCA OF METROPOLITAN DETROIT 1401 BROADWAY ST #3A DETROIT, MI 48226 | | PC | SBL-REGIONAL EMERGING MULTICULTURAL LEADERSHIP EXPERIENCE | 5,000. |
| YUNION, INC., THE 1129 OAKMAN BLVD DETROIT, MI 48238 | | PC | KEYS 2 LIFE MENTORING THROUGH MUSIC AND THE ARTS PROGRAM | 25,000. |
| WAYNE STATE UNIVERSITY 5447 WOODWARD AVE. DETROIT, MI 48202 | | PC | SOCIAL ENTREPRENEURSHIP CONFERENCE SPONSOR | 1,500. |
| AMOUNTS REPORTED ON K-1S VARIOUS VARIOUS, OTHER COUNTRY 99999 | | PC | GENERAL PURPOSE GRANT | 1,314. |
| | | | | |
| | | | | |
| | | | | |
| Total from continuation sheets | | | | |

Underpayment of Estimated Tax by Corporations

Attach to the corporation's tax return. **FORM 990-PF**

2022

Go to www.irs.gov/Form2220 for instructions and the latest information.

| | |
|--|---|
| 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.

| Part I Required Annual Payment | | | |
|--|-----------|-----------|----------|
| 1 Total tax (see instructions) | | 1 | 88,381. |
| 2 a Personal holding company tax (Schedule PH (Form 1120), line 26) included on line 1 | 2a | | |
| b Look-back interest included on line 1 under section 460(b)(2) for completed long-term contracts or section 167(g) for depreciation under the income forecast method | 2b | | |
| c Credit for federal tax paid on fuels (see instructions) | 2c | | |
| d Total. Add lines 2a through 2c | | 2d | |
| 3 Subtract line 2d from line 1. If the result is less than \$500, do not complete or file this form. The corporation does not owe the penalty | | 3 | 88,381. |
| 4 Enter the tax shown on the corporation's 2021 income tax return. See instructions. Caution: If the tax is zero or the tax year was for less than 12 months, skip this line and enter the amount from line 3 on line 5 | | 4 | 815,837. |
| 5 Required annual payment. Enter the smaller of line 3 or line 4. If the corporation is required to skip line 4, enter the amount from line 3 | | 5 | 88,381. |

Part II Reasons for Filing - Check the boxes below that apply. If any boxes are checked, the corporation **must** file Form 2220 even if it does not owe a penalty. See instructions.

6 The corporation is using the adjusted seasonal installment method.

7 The corporation is using the annualized income installment method.

8 The corporation is a "large corporation" figuring its first required installment based on the prior year's tax.

| Part III Figuring the Underpayment | | | | | |
|---|-----------|----------|----------|----------|----------|
| | | (a) | (b) | (c) | (d) |
| 9 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 corporation's tax year | 9 | 05/15/22 | 06/15/22 | 09/15/22 | 12/15/22 |
| 10 Required installments. If the box on line 6 and/or line 7 above is checked, enter the amounts from Sch A, line 38. If the box on line 8 (but not 6 or 7) is checked, see instructions for the amounts to enter. If none of these boxes are checked, enter 25% (0.25) of line 5 above in each column | 10 | 22,095. | 22,096. | 22,095. | 22,095. |
| 11 Estimated tax paid or credited for each period. For column (a) only, enter the amount from line 11 on line 15. See instructions | 11 | | 75,000. | 75,000. | |
| Complete lines 12 through 18 of one column before going to the next column. | | | | | |
| 12 Enter amount, if any, from line 18 of the preceding column | 12 | | | 30,809. | 83,714. |
| 13 Add lines 11 and 12 | 13 | | 75,000. | 105,809. | 83,714. |
| 14 Add amounts on lines 16 and 17 of the preceding column | 14 | | 22,095. | | |
| 15 Subtract line 14 from line 13. If zero or less, enter -0- | 15 | 0. | 52,905. | 105,809. | 83,714. |
| 16 If the amount on line 15 is zero, subtract line 13 from line 14. Otherwise, enter -0- | 16 | | 0. | 0. | |
| 17 Underpayment. If line 15 is less than or equal to line 10, subtract line 15 from line 10. Then go to line 12 of the next column. Otherwise, go to line 18 | 17 | 22,095. | | | |
| 18 Overpayment. If line 10 is less than line 15, subtract line 10 from line 15. Then go to line 12 of the next column | 18 | | 30,809. | 83,714. | |

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.

Part IV Figuring the Penalty

| | (a) | (b) | (c) | (d) |
|--|--------------|-------------------------------|-----|------------|
| 19 Enter the date of payment or the 15th day of the 4th month after the close of the tax year, whichever is earlier. (C corporations with tax years ending June 30 and S corporations: Use 3rd month instead of 4th month. Form 990-PF and Form 990-T filers: Use 5th month instead of 4th month.) See instructions | 19 | | | |
| 20 Number of days from due date of installment on line 9 to the date shown on line 19 | 20 | | | |
| 21 Number of days on line 20 after 4/15/2022 and before 7/1/2022 | 21 | | | |
| 22 Underpayment on line 17 x $\frac{\text{Number of days on line 21} \times 4\% (0.04)}{365}$... | 22 \$ | \$ | \$ | \$ |
| 23 Number of days on line 20 after 6/30/2022 and before 10/1/2022 | 23 | | | |
| 24 Underpayment on line 17 x $\frac{\text{Number of days on line 23} \times 5\% (0.05)}{365}$... | 24 \$ | \$ | \$ | \$ |
| 25 Number of days on line 20 after 9/30/2022 and before 1/1/2023 | 25 | | | |
| 26 Underpayment on line 17 x $\frac{\text{Number of days on line 25} \times 6\% (0.06)}{365}$... | 26 \$ | \$ | \$ | \$ |
| 27 Number of days on line 20 after 12/31/2022 and before 4/1/2023 | 27 | SEE ATTACHED WORKSHEET | | |
| 28 Underpayment on line 17 x $\frac{\text{Number of days on line 27} \times 7\% (0.07)}{365}$... | 28 \$ | \$ | \$ | \$ |
| 29 Number of days on line 20 after 3/31/2023 and before 7/1/2023 | 29 | | | |
| 30 Underpayment on line 17 x $\frac{\text{Number of days on line 29} \times \%}{365}$ | 30 \$ | \$ | \$ | \$ |
| 31 Number of days on line 20 after 6/30/2023 and before 10/1/2023 | 31 | | | |
| 32 Underpayment on line 17 x $\frac{\text{Number of days on line 31} \times \%}{365}$ | 32 \$ | \$ | \$ | \$ |
| 33 Number of days on line 20 after 9/30/2023 and before 1/1/2024 | 33 | | | |
| 34 Underpayment on line 17 x $\frac{\text{Number of days on line 33} \times \%}{365}$ | 34 \$ | \$ | \$ | \$ |
| 35 Number of days on line 20 after 12/31/2023 and before 3/16/2024 | 35 | | | |
| 36 Underpayment on line 17 x $\frac{\text{Number of days on line 35} \times \%}{366}$ | 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 total here and on Form 1120, line 34; or the comparable line for other income tax returns | 38 \$ | | | 75. |

* Use the penalty interest rate for each calendar quarter, which the IRS will determine during the first month in the preceding quarter. These rates are published quarterly in an IRS News Release and in a revenue ruling in the Internal Revenue Bulletin. To obtain this information on the Internet, access the IRS website at www.irs.gov. You can also call 1-800-829-4933 to get interest rate information.

FORM 990-PF
UNDERPAYMENT OF ESTIMATED TAX WORKSHEET

| | | | | | |
|--|--|--|--|--|---|
| Name(s) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | | | | | Identifying Number 38-1784340 |
|--|--|--|--|--|---|

| (A) *Date | (B) Amount | (C) Adjusted Balance Due | (D) Number Days Balance Due | (E) Daily Penalty Rate | (F) Penalty |
|--------------|---------------|--------------------------------|-----------------------------------|------------------------------|----------------|
| | | -0- | | | |
| 05/15/22 | 22,095. | 22,095. | 31 | .000109589 | 75. |
| 06/15/22 | 22,096. | 44,191. | | | |
| 06/15/22 | -75,000. | -30,809. | | | |
| 06/30/22 | 0. | -30,809. | 77 | .000136986 | |
| 09/15/22 | 22,095. | -8,714. | | | |
| 09/15/22 | -75,000. | -83,714. | | | |
| 09/30/22 | 0. | -83,714. | 76 | .000164384 | |
| 12/15/22 | 22,095. | -61,619. | | | |
| 12/31/22 | 0. | -61,619. | 135 | .000191781 | |
| | | | | | |
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Penalty Due (Sum of Column F). **75.**

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

FORM 990-PF

GAIN OR (LOSS) FROM SALE OF ASSETS

STATEMENT 1

| (A) DESCRIPTION OF PROPERTY | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) MANNER ACQUIRED DEPREC. | DATE ACQUIRED | DATE SOLD (F) GAIN OR LOSS |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|--------------------------------------|------------------|----------------------------------|
| BLACKSTONE RE PARTNERS V.TE.2 | 0. | 66,504. | 0. | PURCHASED | | -66,504. |

| (A) DESCRIPTION OF PROPERTY | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) MANNER ACQUIRED DEPREC. | DATE ACQUIRED | DATE SOLD (F) GAIN OR LOSS |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|--------------------------------------|------------------|----------------------------------|
| BLACKSTONE RE PARTNERS VI.TE.2 | 0. | -1,261. | 0. | PURCHASED | | 1,261. |

| (A) DESCRIPTION OF PROPERTY | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) MANNER ACQUIRED DEPREC. | DATE ACQUIRED | DATE SOLD (F) GAIN OR LOSS |
|-----------------------------------|-----------------------------|-------------------------------|---------------------------|--------------------------------------|------------------|----------------------------------|
| BLACKSTONE RE PARTNERS VI.TE.2-NQ | 0. | -666. | 0. | PURCHASED | | 666. |

| (A) DESCRIPTION OF PROPERTY | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) MANNER ACQUIRED DEPREC. | DATE ACQUIRED | DATE SOLD (F) GAIN OR LOSS |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|--------------------------------------|------------------|----------------------------------|
| BLACKSTONE RE PARTNERS X.F | 0. | -16. | 0. | PURCHASED | | 16. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VII.F (AV-LH) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | -480. | 0. | 0. | 480. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VII.F (AV-LH.4) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | -1,742. | 0. | 0. | 1,742. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VII.F-NQ (AV-LH.3) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | -78,346. | 0. | 0. | 78,346. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VII.F-NQ (AV-LH.4) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | -637,900. | 0. | 0. | 637,900. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VIII.F | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | -806. | 0. | 0. | 806. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VIII.F (AV-LH) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | -4,908. | 0. | 0. | 4,908. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VIII.F (AV-LH.3) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | -546. | 0. | 0. | 546. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VIII.F (AV-LH.4) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | -34,674. | 0. | 0. | 34,674. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VIII.F-NQ (AV-LH) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 26. | 0. | 0. | -26. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VIII.F-NQ (AV-LH.2) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | -969. | 0. | 0. | 969. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| BREP VIII.F-NQ (AV-LH.3) | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 815. | 0. | 0. | -815. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| BREP VIII.F-NQ (AV-LH.4) | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | -5,167. | 0. | 0. | 5,167. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|------------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| FPA APARTMENT OPPORTUNITY FUND V-A | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | -13,024. | 0. | 0. | 13,024. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| MAXIMUM PRIVATE GROWTH FUND | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | -147,369. | 0. | 0. | 147,369. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| SCULPTOR REAL ESTATE PARALLEL FUND III A | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | -104,703. | 0. | 0. | 104,703. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| SQUARE MILE PARTNERS III TE | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | -31,578. | 0. | 0. | 31,578. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| TRIDENT V LP | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | -232. | 0. | 0. | 232. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| ACADIAN EMERGING MARKETS SMALL CAP EQUITY FUND | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 36,746. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| AETHER REAL ASSETS I LP | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | -530,697. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| AIO V AIV LP | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 94,702. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BLACKSTONE RE PARTNERS V.TE.2 | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | -26,882. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BLACKSTONE RE PARTNERS VI.TE.2 | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | -1,179. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|-----------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BLACKSTONE RE PARTNERS VI.TE.2-NQ | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | -666. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BLACKSTONE RE PARTNERS X.F | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | -10. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VII.F | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 239. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| BREP VII.F (AV-LH.4) | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 398. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| BREP VII.F-NQ (AV-LH.3) | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 20,126. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| BREP VIII.F | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 2,305. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| BREP VIII.F (AIV REIT) | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | -625. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| BREP VIII.F (AV-LH) | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | -2,161. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VIII.F (AV-LH.2) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | -21. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VIII.F (AV-LH.3) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 58. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VIII.F (AV-LH.4) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 7,983. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VIII.F-NQ (AV-LH.2) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 1,275. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VIII.F-NQ (AV-LH.4) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 9,623. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| DETROIT VENTURE PARTNERS | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 18,775. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| ENERGY CAPITAL TE-L DIRECT | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 73,738. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| ENERGY CAPITAL TE-L INDIRECT | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 491. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| FORTRESS CREDIT OPPORTUNITIES FUND (B) | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 155,991. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|------------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| FPA APARTMENT OPPORTUNITY FUND V-A | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 14,053. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|-------------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| FPA APARTMENT OPPORTUNITY FUND VI A | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 503,255. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| FPA APARTMENT OPPORTUNITY FUND VII-A | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 90,394. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| ILLUMEN CAPITAL II | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | -2,350. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|---------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| KINDERHOOK CAPITAL FUND IV-B LP | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 418,309. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| MAXIMUM PRIVATE GROWTH FUND | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 6,379,212. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|---|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| METROPOLITAN RE PARTNERS INTERNATIONAL IV | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | -6,666. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| NEW MOUNTAIN PARTNERS III | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 2,068. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| PRAIRIE CAPITAL V | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | -344. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| SCULPTOR REAL ESTATE PARALLEL FUND III A | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | -5,005. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| TFG HEDGE FUND II LLC | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 4,569,254. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| TFG WAKKR 2012 FUND | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 1,741,568. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| THOMA BRAVO FUND XIII-A LP | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 158,223. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| TRIDENT V LP | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 118,724. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| ACADIAN EMERGING MARKETS SMALL CAP EQUITY FUND | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | -125,791. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| AETHER REAL ASSETS I LP | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 22,176. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| AIO V AIV LP | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | -2,287. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| BREP VIII.F (AV-LH.2) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 10. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| FORTRESS CREDIT OPPORTUNITIES FUND (B) | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | -58,893. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| ILLUMEN CAPITAL II | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | -1,096. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-----------------------------|-------------------------------|---------------------------|------------------|---------------------|
| MAXIMUM PRIVATE GROWTH FUND | | | PURCHASED | | |
| | (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS |
| | 0. | 0. | 0. | 0. | 251,062. |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| TFG WAKKR 2012 FUND | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 981. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| THOMA BRAVO XV-A LP | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 61. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| TRIDENT V LP | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | 27. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|-----------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| MELLON PUBLICLY TRADED SECURITIES | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 109,789,612. | 118,380,696. | 0. | 0. | -8,591,084. | |

| (A) DESCRIPTION OF PROPERTY | | | MANNER ACQUIRED | DATE ACQUIRED | DATE SOLD |
|--------------------------------|-------------------------------|---------------------------|--------------------|---------------------|-----------|
| SQUARE MILE PARTNERS III TE | | | PURCHASED | | |
| (B) GROSS SALES PRICE | (C) COST OR OTHER BASIS | (D) EXPENSE OF SALE | (E) DEPREC. | (F) GAIN OR LOSS | |
| 0. | 0. | 0. | 0. | -30,544. | |

CAPITAL GAINS DIVIDENDS FROM PART IV

110,563.

TOTAL TO FORM 990-PF, PART I, LINE 6A

6,413,131.

FORM 990-PF DIVIDENDS AND INTEREST FROM SECURITIES STATEMENT 2

| SOURCE | GROSS AMOUNT | CAPITAL GAINS DIVIDENDS | (A) REVENUE PER BOOKS | (B) NET INVESTMENT INCOME | (C) ADJUSTED NET INCOME |
|--|--------------|-------------------------|-----------------------|---------------------------|-------------------------|
| ACADIAN EMERGING MARKETS SMALL CAP EQUITY FUND - DIV | 278,320. | 0. | 278,320. | 278,320. | |
| AETHER REAL ASSETS I LP- DIV | 3,134. | 0. | 3,134. | 3,134. | |
| AETHER REAL ASSETS I LP- INT | 1,886. | 0. | 1,886. | 1,886. | |
| AIO V AIV LP- DIV | 1,322. | 0. | 1,322. | 1,322. | |
| AIO V AIV LP- INT | 25,844. | 0. | 25,844. | 25,844. | |
| ARTESIAN FARMS L3C - INT | 1,102. | 0. | 1,102. | 1,102. | |
| BLACKSTONE RE PARTNERS V - INT | 47. | 0. | 47. | 47. | |
| BLACKSTONE RE PARTNERS VI - INT | 20. | 0. | 20. | 20. | |
| BLACKSTONE RE PARTNERS VII.F (AV-LH) - INT | 318. | 0. | 318. | 318. | |
| BLACKSTONE RE PARTNERS VII.F (AV-LH.4) - INT | 1. | 0. | 1. | 1. | |
| BLACKSTONE RE PARTNERS VII.F-NQ (AV-LH.3) - INT | 7. | 0. | 7. | 7. | |
| BLACKSTONE RE PARTNERS VII.F-NQ (AV-LH.4) - INT | 4. | 0. | 4. | 4. | |
| BLACKSTONE RE PARTNERS VI-NQ-INT | 3,715. | 0. | 3,715. | 3,715. | |
| BLACKSTONE RE PARTNERS X - DIV | 846. | 0. | 846. | 846. | |
| BLACKSTONE RE PARTNERS X - INT | 427. | 0. | 427. | 427. | |
| BLACKSTONE RE PARTNERS X-TE - INT | 131. | 0. | 131. | 131. | |
| BREP VIII.F - DIV | 455. | 0. | 455. | 455. | |
| BREP VIII.F (AV-LH) - INT | 28. | 0. | 28. | 28. | |
| BREP VIII.F (AV-LH.2) - INT | 12. | 0. | 12. | 12. | |
| BREP VIII.F (AV-LH.3) - INT | 27. | 0. | 27. | 27. | |

| | | | | |
|---|------------|----------|------------|------------|
| BREP VIII.F (AV-LH.4) - DIV | 1,183. | 0. | 1,183. | 1,183. |
| BREP VIII.F (AV-LH.4)- INT | 25. | 0. | 25. | 25. |
| BREP VIII.F-NQ (AV-LH) - INT | 3. | 0. | 3. | 3. |
| BREP VIII.F-NQ (AV-LH.2)- INT | 4,896. | 0. | 4,896. | 4,896. |
| BREP VIII.F-NQ (AV-LH.3) - INT | 69. | 0. | 69. | 69. |
| BREP VIII.F-NQ (AV-LH.4) - INT | 2. | 0. | 2. | 2. |
| BREP VIII.F-NQ (AV-LH.4)- DIV | 368. | 0. | 368. | 368. |
| BREP VIII.F-NQ- INT | 373. | 0. | 373. | 373. |
| CAPITAL GAIN DISTRIBUTIONS - MELLON | 110,563. | 110,563. | 0. | 0. |
| ENERGY CAPITAL TE-L INDIRECT- DIV | 1. | 0. | 1. | 1. |
| ETHOS CAPITAL INVESTMENTS A LP - INT | 118. | 0. | 118. | 118. |
| FORTRESS CREDIT OPPORTUNITIES FUND (B)- DIV | 11. | 0. | 11. | 11. |
| FORTRESS CREDIT OPPORTUNITIES FUND (B)- INT | 674. | 0. | 674. | 674. |
| FPA APARTMENT OPPORTUNITY FUND V-A - INT | 4. | 0. | 4. | 4. |
| GSO ESOF FINANCE - INT | 3,268. | 0. | 3,268. | 3,268. |
| GSO ESOF FINANCE 2 - INT | 15,849. | 0. | 15,849. | 15,849. |
| ILLUMEN CAPITAL II - INT | 483. | 0. | 483. | 483. |
| INTEREST INCOME - PROGRAM RELATED INVESTMENTS | 80,053. | 0. | 80,053. | 80,053. |
| MAXIMUM PRIVATE GROWTH FUND - DIV | 550,548. | 0. | 550,548. | 550,548. |
| MAXIMUM PRIVATE GROWTH FUND - INT | 163,360. | 0. | 163,360. | 153,302. |
| MELLON - INTEREST | 1,231,549. | 0. | 1,231,549. | 1,231,549. |
| MELLON CUSTODY - DIVIDENDS | 3,003,890. | 0. | 3,003,890. | 3,003,890. |
| METROPOLITAN RE PARTNERS INT'L IV- INT | 42. | 0. | 42. | 42. |
| NB SELECT OPPORTUNITIES FUND V - INT | 1,283. | 0. | 1,283. | 1,283. |
| NEW MOUNTAIN PARTNERS III- INT | 5. | 0. | 5. | 5. |

| | | | | |
|--|------------|----------|------------|------------|
| PICO VENTURE PARTNERS III - INT | 3,500. | 0. | 3,500. | 3,500. |
| PRAIRIE CAPITAL V-DIV | 113,102. | 0. | 113,102. | 113,102. |
| PRAIRIE CAPITAL V-INT | 1,152. | 0. | 1,152. | 1,152. |
| SCULPTOR REAL ESTATE PARALLEL FUND III A - DIV | 4,830. | 0. | 4,830. | 4,830. |
| SCULPTOR REAL ESTATE PARALLEL FUND III A - INT | 430. | 0. | 430. | 430. |
| TFG HEDGE FUND II LLC - INT | 8,369. | 0. | 8,369. | 8,369. |
| TFG WAKKR 2012 FUND- DIV | 8,575. | 0. | 8,575. | 8,575. |
| TFG WAKKR 2012 FUND- INT | 8,193. | 0. | 8,193. | 8,193. |
| THIRD & GRAND INVESTORS, LLC - INT | 240. | 0. | 240. | 240. |
| TRIDENT V LP- DIV | 76,026. | 0. | 76,026. | 76,026. |
| TRIDENT V LP- INT | 611. | 0. | 611. | 611. |
| TO PART I, LINE 4 | 5,711,294. | 110,563. | 5,600,731. | 5,590,673. |

FORM 990-PF

OTHER INCOME

STATEMENT 3

| DESCRIPTION | (A) | (B) | (C) |
|--|----------------------|----------------------------|------------------------|
| | REVENUE PER BOOKS | NET INVEST- MENT INCOME | ADJUSTED NET INCOME |
| OTHER INCOME - PRI | 71,159. | 71,159. | |
| ROYALTY INCOME FROM K-1 | 116,384. | 116,384. | |
| ACADIAN EMERGING MARKETS SMALL CAP EQUITY FUND | -74,822. | -74,822. | |
| AETHER REAL ASSETS I LP | -13,885. | -13,885. | |
| AIO V AIV LP | -17,653. | -17,653. | |
| AXIOM EMERGING MARKETS EQUITY FUND | 388,467. | 388,467. | |
| BLACKSTONE RE PARTNERS V | -97,855. | -97,855. | |
| BLACKSTONE RE PARTNERS V | 45. | 0. | |
| BLACKSTONE RE PARTNERS VI | 2. | 0. | |
| BLACKSTONE RE PARTNERS VI | 2,269. | 2,269. | |
| BLACKSTONE RE PARTNERS VI-NQ | 27,397. | 27,397. | |
| BLACKSTONE RE PARTNERS VI-NQ | 2,754. | 0. | |
| BREP VII.F | -801. | -801. | |
| BREP VII.F (AV-LH) | -70. | -70. | |
| BREP VII.F (AV-LH) | -2,143. | 0. | |
| BREP VII.F (AV-LH.2) | -4. | -4. | |
| BREP VII.F (AV-LH.4) | -7,501. | 0. | |
| BREP VII.F (AV-LH.4) | -3,331. | -3,331. | |
| BREP VII.F-NQ (AV-LH) | -415. | -415. | |
| BREP VII.F-NQ (AV-LH.3) | 1,049. | 1,049. | |
| BREP VII.F-NQ (AV-LH.3) | -11,060. | 0. | |
| BREP VII.F-NQ (AV-LH.4) | 52,445. | 0. | |

| | | |
|--|-------------|-------------|
| BREP VIII.F | -2,568. | -2,568. |
| BREP VIII.F | 117. | 0. |
| BREP VIII.F (AIV REIT) | 424. | 424. |
| BREP VIII.F (AIV-LH) | -4,395. | -4,395. |
| BREP VIII.F (AV-LH) | -6,992. | 0. |
| BREP VIII.F (AV-LH.2) | -33. | -33. |
| BREP VIII.F (AV-LH.2) | 6. | 0. |
| BREP VIII.F (AV-LH.3) | -4,712. | 0. |
| BREP VIII.F (AV-LH.4) | -16,247. | -16,247. |
| BREP VIII.F (AV-LH.4) | -6,614. | 0. |
| BREP VIII.F-NQ | -72. | -72. |
| BREP VIII.F-NQ (AV-LH) | -1,499. | -1,499. |
| BREP VIII.F-NQ (AV-LH) | 7,825. | 0. |
| BREP VIII.F-NQ (AV-LH.2) | -15,512. | 0. |
| BREP VIII.F-NQ (AV-LH.3) | -1,956. | -1,956. |
| BREP VIII.F-NQ (AV-LH.3) | -9,419. | 0. |
| BREP VIII.F-NQ (AV-LH.4) | -5,242. | 0. |
| BREP VIII.F-NQ (AV-LH.4) | -3,416. | -3,416. |
| DETROIT VENTURE PARTNERS | -11,039. | -11,039. |
| ENERGY CAPITAL TE-L DIRECT | -312. | -312. |
| ENERGY CAPITAL TE-L INDIRECT | 542. | 0. |
| ENERGY CAPITAL TE-L INDIRECT | -7,592. | -7,592. |
| FORTRESS CREDIT OPPORTUNITIES FUND (B) | 24,633. | 24,633. |
| FPA APARTMENT OPPORTUNITY FUND V-A | -7,855. | -7,855. |
| FPA APARTMENT OPPORTUNITY FUND V-A | -1,084. | 0. |
| FPA APARTMENT OPPORTUNITY FUND VI A | -19,749. | -19,749. |
| FPA APARTMENT OPPORTUNITY FUND VII-A | -26,795. | -26,795. |
| GSO ESOF FINANCE | -78. | -78. |
| KINDERHOOK CAPITAL FUND IV-B LP | -1,802. | -1,802. |
| MAXIMUM PRIVATE GROWTH FUND | 214,700. | 0. |
| MAXIMUM PRIVATE GROWTH FUND | -1,253,775. | -1,253,775. |
| METROPOLITAN RE PARTNERS INTERNATIONAL IV | 5,749. | 5,749. |
| METROPOLITAN RE PARTNERS INT'L II | -3,999. | -3,999. |
| NEW MOUNTAIN PARTNERS III | -128. | -128. |
| PICO VENTURE PARTNERS III | -39,163. | -39,163. |
| PRAIRIE CAPITAL V | -7,461. | -7,461. |
| PRAIRIE CAPITAL V | 23,498. | 0. |
| RAM REALTY PARTNERS VI | -16,397. | -16,397. |
| SCULPTOR REAL ESTATE PARALLEL FUND III A | -171. | 0. |
| SCULPTOR REAL ESTATE PARALLEL FUND III A | 38,120. | 38,120. |
| SQUARE MILE PARTNERS III TE | -2,001. | 0. |
| TFG WAKKR 2012 FUND | 29. | 0. |
| TFG WAKKR 2012 FUND | -50,460. | -50,460. |
| THIRD & GRAND INVESTORS, LLC | -442,035. | 0. |
| THOMA BRAVO FUND XIII-A LP | -47,265. | -47,265. |
| TRIDENT V LP | -6,511. | -6,511. |
| TRIDENT V LP | 12,891. | 0. |
| TFG HEDGE FUND II LLC | -103,728. | -103,728. |
| BLACKSTONE RE PARTNERS X | -8,704. | 0. |
| ILLUMEN CAPITAL II | -8. | 0. |
| ALMANAC REALTY SECURITIES | -163,972. | -163,972. |
| ARTESIAN FARMS L3C | -231. | -231. |
| BLACKSTONE RE PARTNERS X (AV-MH.3) | -862. | 0. |

| | | |
|--|--------------------|--------------------|
| BLACKSTONE RE PARTNERS X (OFFSHORE) | -5,986. | 0. |
| BREP VII.F-NQ | -6. | -6. |
| BREP VII.F-NQ (AV-LH.2) | -24. | -24. |
| ETHOS CAPITAL INVESTMENTS A LP | -107,078. | 0. |
| GSO ESOF FINANCE 2 | -148. | -148. |
| ILLUMEN CAPITAL II | -21,898. | -21,898. |
| NB RE SECONDARY OPPORTUNITIES FUND II | -113,435. | -113,435. |
| NB SELECT OPPORTUNITES FUND V | -9,286. | 0. |
| SQUARE MILE PARTNERS III TE | -6. | -6. |
| THOMA BRAVO XV-A | -74,639. | -74,639. |
| BLACKSTONE RE PARTNERS X | -1,070. | -1,070. |
| BLACKSTONE RE PARTNERS X (OFFSHORE) | -17. | -17. |
| BREP VIII.F (AV-LH.3) | -210. | -210. |
| ETHOS CAPITAL INVESTMENTS A LP | -173,754. | -173,754. |
| NB SELECT OPPORTUNITES FUND V | -68,933. | -68,933. |
| TOTAL TO FORM 990-PF, PART I, LINE 11 | -2,117,379. | -1,785,823. |

| FORM 990-PF | LEGAL FEES | | | STATEMENT 4 |
|----------------------------|------------------------------|-----------------------------------|-------------------------------|-------------------------------|
| DESCRIPTION | (A) EXPENSES PER BOOKS | (B) NET INVEST- MENT INCOME | (C) ADJUSTED NET INCOME | (D) CHARITABLE PURPOSES |
| LEGAL FEES | 90,301. | 0. | | 102,597. |
| TO FM 990-PF, PG 1, LN 16A | 90,301. | 0. | | 102,597. |

| FORM 990-PF | ACCOUNTING FEES | | | STATEMENT 5 |
|------------------------------|------------------------------|-----------------------------------|-------------------------------|-------------------------------|
| DESCRIPTION | (A) EXPENSES PER BOOKS | (B) NET INVEST- MENT INCOME | (C) ADJUSTED NET INCOME | (D) CHARITABLE PURPOSES |
| ACCOUNTING FEES | 81,775. | 53,154. | | 113,247. |
| TO FORM 990-PF, PG 1, LN 16B | 81,775. | 53,154. | | 113,247. |

FORM 990-PF

OTHER PROFESSIONAL FEES

STATEMENT 6

| DESCRIPTION | (A) EXPENSES PER BOOKS | (B) NET INVEST- MENT INCOME | (C) ADJUSTED NET INCOME | (D) CHARITABLE PURPOSES |
|------------------------------|------------------------------|-----------------------------------|-------------------------------|-------------------------------|
| MELLON CUSTODIAL FEES | 62,523. | 62,523. | | 0. |
| PAYROLL 1 FEES | 2,750. | 0. | | 2,750. |
| PROGRAM CONSULTANT | 347,587. | 0. | | 242,332. |
| WEBSITE MAINTENANCE | 94,071. | 0. | | 94,071. |
| TFG SERVICE PROVIDER FEE | 1,679,969. | 1,091,979. | | 493,258. |
| INVESTMENT MANAGEMENT FEES | 1,654,955. | 1,654,955. | | 0. |
| TO FORM 990-PF, PG 1, LN 16C | 3,841,855. | 2,809,457. | | 832,411. |

FORM 990-PF

TAXES

STATEMENT 7

| DESCRIPTION | (A) EXPENSES PER BOOKS | (B) NET INVEST- MENT INCOME | (C) ADJUSTED NET INCOME | (D) CHARITABLE PURPOSES |
|-----------------------------|------------------------------|-----------------------------------|-------------------------------|-------------------------------|
| FORM 990 TAXES | 199,955. | 0. | | 0. |
| STATE TAXES | 11,766. | 0. | | 0. |
| TO FORM 990-PF, PG 1, LN 18 | 211,721. | 0. | | 0. |

FORM 990-PF

OTHER EXPENSES

STATEMENT 8

| DESCRIPTION | (A) EXPENSES PER BOOKS | (B) NET INVEST- MENT INCOME | (C) ADJUSTED NET INCOME | (D) CHARITABLE PURPOSES |
|--------------------------------------|------------------------------|-----------------------------------|-------------------------------|-------------------------------|
| EMPLOYEE TRAINING | 42,014. | 0. | | 42,014. |
| MISCELLANEOUS EXPENSES | 23,699. | 0. | | 271,680. |
| TELEPHONE EXPENSE | 9,075. | 0. | | 9,075. |
| POSTAGE | 2,297. | 0. | | 2,297. |
| INFORMATION SYSTEMS | 22,496. | 0. | | 22,496. |
| GRANT TRACKING SOFTWARE | 39,543. | 0. | | 39,543. |
| CONTRIBUTION SPONSORSHIPS EXPENSE | 17,033. | 0. | | 17,033. |
| OTHER DEDUCTIONS FROM K-1'S | 7. | 0. | | 7. |
| TAX OFFSET PY OVERPAYMENTS | -804,825. | 0. | | -804,825. |
| AMORTIZATION | 73,003. | 0. | | 73,003. |
| TO FORM 990-PF, PG 1, LN 23 | -575,658. | 0. | | -327,677. |

FORM 990-PF OTHER DECREASES IN NET ASSETS OR FUND BALANCES STATEMENT 9

| DESCRIPTION | AMOUNT |
|--|-------------|
| UNREALIZED LOSS | 33,927,481. |
| K-1 INCOME/LOSS | 13,989,033. |
| | |
| TOTAL TO FORM 990-PF, PART III, LINE 5 | 47,916,514. |

FORM 990-PF OTHER INVESTMENTS STATEMENT 10

| DESCRIPTION | VALUATION METHOD | BOOK VALUE | FAIR MARKET VALUE |
|--|---------------------|------------|----------------------|
| 11,974.349 SHS TFG HEDGE FUND II (FISHER FAIRWAY MASTER FUND LTD) | FMV | 1,734,814. | 1,734,814. |
| 29,374.107 SHS TFG ARTEMIS VIII 2013 FUND LLC | FMV | 2,073,040. | 2,073,040. |
| 21,944.706 SHS TFG EC III 2014 FUND LLC | FMV | 1,406,813. | 1,406,813. |
| 41,098.401 SHS TFG ARA III 2013 FUND | FMV | 2,927,038. | 2,927,038. |
| 3,829.517 SHS TFG WAKKR 2012 FUND LLC | FMV | 568,321. | 568,321. |
| 12,537.425 SHS TFG VISTA 2014 FUND LLC | FMV | 3,714,120. | 3,714,120. |
| 19,193.358 SHS TFG VISTA VI 2016 FUND | FMV | 4,138,264. | 4,138,264. |
| 3,117,695.530 SHS ANCHORAGE ILLIQUID OPPORTUNITIES OFFSHORE V | FMV | 1,482,685. | 1,482,685. |
| 1,922,890.570 SHS KINDERHOOK CAPITAL FUND IV-B | FMV | 1,530,296. | 1,530,296. |
| 3,063.135 SHS TFG PAM III | FMV | 1,340,940. | 1,340,940. |
| 9,526.031 TFG TRIDENT VI 2014 FUND LLC | FMV | 2,351,223. | 2,351,223. |
| 1,734.720 SHS TFG MAGNETITE 2014 FUND LLC | FMV | 497,817. | 497,817. |
| 13,533.642 SHS TFG ENERGY RIDGE 2013 FUND | FMV | 1,582,754. | 1,582,754. |
| 1,199,807.800 SHS BLACKSTONE REAL ESTATE PARTNERS VII F | FMV | 517,770. | 517,770. |
| 17,336.033 SHS TFG RAM IV 2015 FUND | FMV | 288,274. | 288,274. |
| 1,059,778.000 SHS GSO ENERGY SELECT OPPORTUNITIES FEEDER FUND | FMV | 455,233. | 455,233. |
| 1,633,507.120 SHS BLACKSTONE REAL ESTATE PARTNERS VIII | FMV | 1,554,868. | 1,554,868. |
| 2,774.272 SHS TFG NEWVEST SECONDARIES 2013 FUND | FMV | 599,097. | 599,097. |
| 9,845.499 SHS TFG TRIEUROPROP 2013 FUND LLC | FMV | 720,636. | 720,636. |
| 1,319,437.340 SHS TRIDENT V LP | FMV | 1,286,898. | 1,286,898. |
| 16,804.101 SHS TFG AXIOS IV 2015 FUND | FMV | 2,297,197. | 2,297,197. |

| <u>MAX M. & MARJORIE S. FISHER FOUNDATION,</u> | | <u>38-1784340</u> | |
|---|-----|-------------------|------------|
| 11,708.429 SHS TFG TRI EURO 2015 FUND 4 LLC | FMV | 1,533,677. | 1,533,677. |
| 222.670 SHS TFG EXETER III 2013 FUND LLC | FMV | 143,972. | 143,972. |
| 57,006.870 FPA APARTMENT OPPORTUNITY FUND V | FMV | 167. | 167. |
| 12,873.260 SHS TFG ARBOR IV 2015 FUND | FMV | 1,181,047. | 1,181,047. |
| 1,076,936.000 SHS STRATEGIC VALUE SPECIAL SITUATION FEEDER FUND II LP | FMV | 805,221. | 805,221. |
| 973,543.180 SHS PRAIRIE CAPITAL V | FMV | 892,643. | 892,643. |
| 13,160.591 TFG EXETER IV 2017 FUND | FMV | 295,665. | 295,665. |
| 2,178,840.380 SHS FPA APARTMENT OPPORTUNITY FUND VI | FMV | 927,334. | 927,334. |
| 624,459.620 SHS METROPOLITAN REAL ESTATE PARTNERS INT IV LP | FMV | 448,371. | 448,371. |
| 8,544.000 SHS NEW MOUNTAIN PARTNERS III | FMV | 50,517. | 50,517. |
| 497,350.000 SHS AETHER INVESTEMENT PARTNERS | FMV | 16,232. | 16,232. |
| 9,516.279 SHS TFG 2011 ARA II FUND LLC | FMV | 468,538. | 468,538. |
| 29,799.783 SHS TFG ENERGY RIDGE III 2015 FUND | FMV | 2,587,515. | 2,587,515. |
| 303,821.050 SHS FORTRESS CREDIT OPPS FUND B LP | FMV | 62,336. | 62,336. |
| 11,754.515 TFG KINDER V 2017 FUND | FMV | 2,370,262. | 2,370,262. |
| 10,267.120 SHS TFG 2012 EC MEZZ FUND | FMV | 221,620. | 221,620. |
| 924.881 SHS TFG MGRE FUND 2013 LLC | FMV | 99,553. | 99,553. |
| 815.712 SHS TFG ARTEMIS FUND LLC | FMV | 69,907. | 69,907. |
| 10,430.807 SHS TFG RAISED CITY 2018 FUND | FMV | 617,122. | 617,122. |
| 510,382.730 SHS TFG RAM RE FUND LLC | FMV | 358,671. | 358,671. |
| 345,545.000 SHS SCULPTOR REAL ESTATE FUND III | FMV | 313,089. | 313,089. |
| 13,892.131 SHS TFG ELAB II 2017 FUND | FMV | 1,993,951. | 1,993,951. |
| 90,831.650 SHS BLACKSTONE VI | FMV | 57,328. | 57,328. |
| 625,805.000 SHS DETROIT VENTURE PARTNERS LP | FMV | 506,088. | 506,088. |
| 31,415.005 SHS TFG HURON 2016 FUND | FMV | 1,794,029. | 1,794,029. |
| 101,311.520 SHS BLACKSTONE REAL ESTATE PARTNERS V TE 2 LP | FMV | 3,482. | 3,482. |
| 30,499.919 SHS TFG AXIOS V 2018 FUND | FMV | 4,437,169. | 4,437,169. |
| 109,146.720 SHS METROPOLITAN REAL ESTATE PARTNERS INT II | FMV | 35,588. | 35,588. |
| 3,302.315 SHS TFG RAM V 2018 FUND | FMV | 696,482. | 696,482. |
| 11.286 SHS TFG EXETER INDUSTRIAL VALUE FUND II LP | FMV | 11,475. | 11,475. |
| 20,914.162 SHS TFG EUROPEAN RE FUND LLC | FMV | 18,167. | 18,167. |
| 1,508,320.780 SHS FPA APARTMENT OPPORTUNITY FUND VII | FMV | 2,430,351. | 2,430,351. |
| 32,541.281 SHS TFG TRI EURO 2018 FUND 5 | FMV | 1,714,111. | 1,714,111. |

| <u>MAX M. & MARJORIE S. FISHER FOUNDATION,</u> | | <u>38-1784340</u> |
|---|-----|-------------------------|
| 2,911,634.000 SHS GOLDENTREE DISTRESSED FUND III (CAYMAN) | FMV | 1,855,594. |
| 77,881.629 SHS TFG ARBOR V 2019 FUND | FMV | 2,031,049. |
| 22,804.901 SHS TFG ARTEMIS IX 2017 FUND | FMV | 3,746,305. |
| 12,870.685 SHS TFG BAR ASIA VII FUND 2018 | FMV | 2,202,766. |
| 31,345.086 SHS TFG CHERRY LAKE FUND | FMV | 8,126,525. |
| 8,924.029 SHS TFG OCEANS IV 2019 FUND | FMV | 1,792,218. |
| 22,189.751 SHS TFG PONT SK 2019 FUND | FMV | 3,879,220. |
| 8,554,317.900 SHS THOMA BRAVO FUND XIII | FMV | 8,780,130. |
| 34,314.195 SHS TFG BRAVO XIV 2020 FUND | FMV | 3,766,917. |
| 9,848.751 TFG PAM V 2020 FUND | FMV | 1,207,233. |
| ILLUMEN CAPITAL II LP | FMV | 123,402. |
| 2,791,935.000 SHS NB CREDIT OPP II CAYMAN FEEDER | FMV | 3,367,010. |
| 107,064.000 SHS PICO VENTURE PARTNERS III | FMV | 434,356. |
| 545,643.202 SHS MFS EMERGING MARKTS DEBT-I | FMV | 10,551,780. |
| 1,621,722.760 SHS NEUBERGER BERMAN HIGH INC BOND | FMV | 10,209,569. |
| 5,712,346.330 SHS ACADIAN EMERGING MARKETS SMALL CAP EQUITY FUND | FMV | 4,987,258. |
| 5,163,475.470 SHS AXIOM EMERGING MARKETS EQUITY FUND | FMV | 3,561,024. |
| 201,096.000 SHS ISHARES ESG AWARE MSCI USA | FMV | 17,042,886. |
| FDTN TIAA CREF CORE IMPACT BOND | FMV | 39,587,119. |
| FDTN NB SUSTAINABLE RESEARCH OPPORTUNITIES | FMV | 27,346,694. |
| FDTN CLARKSTON SMALL CAPITAL QUALITY VALUE | FMV | 8,027,495. |
| FDTN KAYNE ANDERSON SMALL CAP GROWTH | FMV | 4,990,350. |
| FDTN NB INTERNATIONAL EQUITY ADR | FMV | 7,020,171. |
| FDTN WCM INTERNATIONAL FOCUSED GROWTH | FMV | 6,057,789. |
| NEUBERGER FLOATING RATE | FMV | 3,974,913. |
| ARTISAN INTERNATIONAL VAL-ADV | FMV | 6,067,973. |
| RAM REALTY PARTNERS VI | FMV | 85,427. |
| NB SELECT OPPORTUNITIES FUND V | FMV | 3,222,636. |
| ETHOS CAPITAL INVESTMENTS A | FMV | 4,303,612. |
| ALMANAC REALTY SECURITIES IX | FMV | 1,196,889. |
| THOMA BRAVO FUND XV-A | FMV | 2,802,680. |
| TOTAL TO FORM 990-PF, PART II, LINE 13 | | <u>262,578,768.</u> |

262,578,768.

FORM 990-PF DEPRECIATION OF ASSETS NOT HELD FOR INVESTMENT STATEMENT 11

| DESCRIPTION | COST OR OTHER BASIS | ACCUMULATED DEPRECIATION | BOOK VALUE |
|------------------------------------|------------------------|-----------------------------|------------|
| OFFICE EQUIPMENT | 41,908. | 37,223. | 4,685. |
| COMPUTERS | 64,170. | 50,732. | 13,438. |
| TOTAL TO FM 990-PF, PART II, LN 14 | 106,078. | 87,955. | 18,123. |

FORM 990-PF OTHER ASSETS STATEMENT 12

| DESCRIPTION | BEGINNING OF YR BOOK VALUE | END OF YEAR BOOK VALUE | FAIR MARKET VALUE |
|---|-------------------------------|---------------------------|----------------------|
| PROGRAM-RELATED INVESTMENTS | 5,141,592. | 6,348,951. | 6,348,951. |
| ARTWORK | 87,500. | 87,500. | 87,500. |
| RIGHT TO USE ASSET NET OF AMORTIZATION | 0. | 292,010. | 292,010. |
| TO FORM 990-PF, PART II, LINE 15 | 5,229,092. | 6,728,461. | 6,728,461. |

FORM 990-PF NAME OF FOREIGN COUNTRY IN WHICH ORGANIZATION HAS FINANCIAL INTEREST STATEMENT 13

NAME OF COUNTRY

CAYMAN ISLANDS
GUERNSEY
JERSEY
GERMANY

FORM 990-PF EXPLANATION CONCERNING PART VI-A, LINE 12 QUALIFYING DISTRIBUTION STATEMENT STATEMENT 14

EXPLANATION

THE FOUNDATION MADE SEVERAL GRANTS TO DONOR-ADVISED FUNDS THAT WERE TREATED AS QUALIFYING DISTRIBUTIONS. THE FUNDS ARE USED TO BENEFIT OTHER PUBLIC CHARITIES WHOSE MISSION IS CONSISTENT WITH THAT OF THE FOUNDATION.

EXPLANATION

THE FUNDS ARE USED TO BENEFIT OTHER PUBLIC CHARITIES WHOSE MISSION IS
CONSISTENT WITH THAT OF THE FOUNDATION.

FORM 990-PF

PART VII - LIST OF OFFICERS, DIRECTORS
TRUSTEES AND FOUNDATION MANAGERS

STATEMENT 16

| NAME AND ADDRESS | TITLE AND AVRG HRS/WK | COMPEN- SATION | EMPLOYEE BEN PLAN CONTRIB | EXPENSE ACCOUNT |
|--|-----------------------------|-------------------|------------------------------|--------------------|
| JULIE FISHER CUMMINGS TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | TRUSTEE 1.00 | 0. | 0. | 0. |
| PHILLIP WM. FISHER TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | MANAGING TRUSTEE 1.00 | 0. | 0. | 0. |
| DR. MARJORIE M. FISHER TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | TREASURER 1.00 | 0. | 0. | 0. |
| JANE F. SHERMAN TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | TRUSTEE 1.00 | 0. | 0. | 0. |
| DAVID SHERMAN TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | NEXT GEN TRUSTEE 1.00 | 0. | 0. | 0. |
| CAROLINE RAFFERTY TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | NEXT GEN TRUSTEE 1.00 | 0. | 0. | 0. |
| AMANDA FISHER TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | NEXT GEN TRUSTEE 1.00 | 0. | 0. | 0. |
| ALISSANDRA ARONOW TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | NEXT GEN TRUSTEE 1.00 | 0. | 0. | 0. |
| ANDREW SHERMAN TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | NEXT GEN TRUSTEE 1.00 | 0. | 0. | 0. |
| DOUGLAS BITONTI STEWART TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | EXECUTIVE DIRECTOR 40.00 | 448,049. | 49,539. | 0. |

MAX M. & MARJORIE S. FISHER FOUNDATION,

38-1784340

TOTALS INCLUDED ON 990-PF, PAGE 6, PART VII

| | | |
|-----------------|----------------|-----------|
| <u>448,049.</u> | <u>49,539.</u> | <u>0.</u> |
|-----------------|----------------|-----------|

FORM 990-PF

EXPENDITURE RESPONSIBILITY STATEMENT
PART VI-B, LINE 5D

STATEMENT 17

GRANTEE'S NAME

REBEL NELL L3C

GRANTEE'S ADDRESS

1401 VERMONT ST.
DETROIT, MI 48216

| <u>GRANT AMOUNT</u> | <u>DATE OF GRANT</u> | <u>AMOUNT EXPENDED</u> |
|---------------------|----------------------|------------------------|
| 195,000. | 12/01/17 | 195,000. |

PURPOSE OF GRANT

THE FOUNDATION DID NOT MAKE A GRANT TO THIS NONCHARITABLE ORGANIZATION. HOWEVER, IT DID MAKE A PROGRAM-RELATED INVESTMENT IN THE FORM OF A LOAN TO THE ORGANIZATION TO EMPLOY AND PROVIDE LIFE SKILLS TRAINING TO FORMERLY HOMELESS WOMEN IN DETROIT AND PROVIDE EDUCATION IN FINANCIAL LITERACY, BUSINESS EDUCATION, HEALTH AND WELLNESS, AND EMPOWER THEM TO TRANSITION TO INDEPENDENT LIFE.

DATES OF REPORTS BY GRANTEE

JANUARY, 2019; MAY, 2020; MAY, 2021; MARCH, 2022; MAY 2023

ANY DIVERSION BY GRANTEE

NO

GRANTEE'S NAME

DETROIT COMMUNITY LOAN FUND

GRANTEE'S ADDRESS

333 W FORT ST STE 2010
DETROIT, MI 48226

| <u>GRANT AMOUNT</u> | <u>DATE OF GRANT</u> | <u>AMOUNT EXPENDED</u> |
|---------------------|----------------------|------------------------|
| 2,000,000. | 05/12/17 | 2,000,000. |

PURPOSE OF GRANT

THE FOUNDATION DID NOT MAKE A GRANT TO THIS NONCHARITABLE ORGANIZATION. HOWEVER, IT DID MAKE A PROGRAM-RELATED INVESTMENT IN THE FORM OF A LOAN TO THE ORGANIZATION TO SUPPORT NEW AND GROWING BUSINESSES IN THE CITY OF DETROIT.

DATES OF REPORTS BY GRANTEE

AUGUST, 2019; MAY, 2020; MAY, 2021; MARCH, 2022; MAY 2023

ANY DIVERSION BY GRANTEE

NO

GRANTEE'S NAME

REBEL NELL L3C

GRANTEE'S ADDRESS

1401 VERMONT ST.
DETROIT, MI 48216

| <u>GRANT AMOUNT</u> | <u>DATE OF GRANT</u> | <u>AMOUNT EXPENDED</u> |
|---------------------|----------------------|------------------------|
| 195,000. | 12/17/18 | 195,000. |

PURPOSE OF GRANT

THE FOUNDATION DID NOT MAKE A GRANT TO THIS NONCHARITABLE ORGANIZATION. HOWEVER, IT DID MAKE A PROGRAM-RELATED INVESTMENT IN THE FORM OF A LOAN TO THE ORGANIZATION TO EMPLOY AND PROVIDE LIFE SKILLS TRAINING TO FORMERLY HOMELESS WOMEN IN DETROIT AND PROVIDE EDUCATION IN FINANCIAL LITERACY, BUSINESS EDUCATION, HEALTH AND WELLNESS, AND EMPOWER THEM TO TRANSITION TO INDEPENDENT LIFE.

DATES OF REPORTS BY GRANTEE

MAY, 2020; MAY, 2021; MARCH, 2022; MAY 2023

ANY DIVERSION BY GRANTEE

NO

GRANTEE'S NAME

DETROIT TRAINING CENTER

GRANTEE'S ADDRESS

5151 LORAIN STREET
DETROIT, MI 48208

| <u>GRANT AMOUNT</u> | <u>DATE OF GRANT</u> | <u>AMOUNT EXPENDED</u> |
|---------------------|----------------------|------------------------|
| 350,000. | 05/18/20 | 350,000. |

PURPOSE OF GRANT

THE FOUNDATION DID NOT MAKE A GRANT TO THIS NONCHARITABLE ORGANIZATION. HOWEVER, IT DID MAKE A PROGRAM-RELATED INVESTMENT IN THE FORM OF A LOAN TO THE ORGANIZATION TO DEVELOP WORKFORCE TRAINING PROGRAMS IN THE CONSTRUCTION INDUSTRY FOR THOSE WITH VARIOUS BARRIERS TO EMPLOYMENT.

DATES OF REPORTS BY GRANTEE

MAY, 2021; MARCH, 2022; MAY 2023

ANY DIVERSION BY GRANTEE

NO

GRANTEE'S NAME

OGEN-SOCIAL LOAN FUND

GRANTEE'S ADDRESS

RIVKA 29 JERUSALEM
, ISRAEL

| <u>GRANT AMOUNT</u> | <u>DATE OF GRANT</u> | <u>AMOUNT EXPENDED</u> |
|---------------------|----------------------|------------------------|
| 1,000,000. | 06/18/20 | 400,000. |

PURPOSE OF GRANT

THE FOUNDATION DID NOT MAKE A GRANT TO THIS NONCHARITABLE ORGANIZATION. HOWEVER, IT DID MAKE A PROGRAM-RELATED INVESTMENT IN THE FORM OF A LOAN TO THE ORGANIZATION TO FURTHER PROVIDE LOANS TO FAMILIES IN NEED AND SMALL BUSINESSES THROUGHOUT ISRAEL.

DATES OF REPORTS BY GRANTEE

MAY, 2021; MARCH, 2022; MAY 2023

ANY DIVERSION BY GRANTEE

NO

DESCRIPTION

ISAAC AGREE DOWNTOWN SYNAGOGUE - THE ORGANIZATION FOCUSES ON SERVING DETROIT'S JEWISH COMMUNITY AS A CONVENING HUB AND EXPANDS PROGRAMMING THAT REACHES A GREATER NUMBER OF JEWISH FAMILIES AND CHILDREN.

AMOUNT

TO FORM 990-PF, PART VIII-B, LINE 2

500,000.

FORM 990-PF

OTHER REVENUE

STATEMENT 19

| DESCRIPTION | BUS CODE | UNRELATED BUSINESS INC | EXCL CODE | EXCLUDED AMOUNT | RELATED OR EXEMPT FUNC- TION INCOME |
|---------------------------|-------------|---------------------------|--------------|--------------------|---|
| OTHER INCOME - PRI | | | | 568. | 70,591. |
| ROYALTY INCOME FROM K-1 | | | 15 | 116,384. | |
| ACADIAN EMERGING MARKETS | | | | | |
| SMALL CAP EQUITY FUND | | | 14 | -74,822. | |
| AETHER REAL ASSETS I LP | | | 14 | -13,885. | |
| AIO V AIV LP | | | 14 | -17,653. | |
| AXIOM EMERGING MARKETS | | | | | |
| EQUITY FUND | | | 14 | 388,467. | |
| BLACKSTONE RE PARTNERS V | | | 14 | -97,855. | |
| BLACKSTONE RE PARTNERS V | 531390 | 45. | | | |
| BLACKSTONE RE PARTNERS VI | 531390 | 2. | | | |
| BLACKSTONE RE PARTNERS VI | | | 14 | 2,269. | |
| BLACKSTONE RE PARTNERS | | | | | |
| VI-NQ | | | 14 | 27,397. | |
| BLACKSTONE RE PARTNERS | 531390 | | | | |
| VI-NQ | | 2,754. | | | |
| BREP VII.F | | | 14 | -801. | |
| BREP VII.F (AV-LH) | | | 14 | -70. | |
| BREP VII.F (AV-LH) | 531390 | -2143. | | | |
| BREP VII.F (AV-LH.2) | | | 14 | -4. | |
| BREP VII.F (AV-LH.4) | 531390 | -7501. | | | |
| BREP VII.F (AV-LH.4) | | | 14 | -3,331. | |
| BREP VII.F-NQ (AV-LH) | | | 14 | -415. | |
| BREP VII.F-NQ (AV-LH.3) | | | 14 | 1,049. | |
| BREP VII.F-NQ (AV-LH.3) | 531390 | -11060 | | | |
| BREP VII.F-NQ (AV-LH.4) | 531390 | 52445. | | | |
| BREP VIII.F | | | 14 | -2,568. | |
| BREP VIII.F | 531390 | 117. | | | |
| BREP VIII.F (AIV REIT) | | | 14 | 424. | |
| BREP VIII.F (AIV-LH) | | | 14 | -4,395. | |
| BREP VIII.F (AV-LH) | 531390 | -6992. | | | |
| BREP VIII.F (AV-LH.2) | | | 14 | -33. | |
| BREP VIII.F (AV-LH.2) | 531390 | 6. | | | |
| BREP VIII.F (AV-LH.3) | 531390 | -4712. | | | |
| BREP VIII.F (AV-LH.4) | | | 14 | -16,247. | |
| BREP VIII.F (AV-LH.4) | 531390 | -6614. | | | |
| BREP VIII.F-NQ | | | 14 | -72. | |
| BREP VIII.F-NQ (AV-LH) | | | 14 | -1,499. | |
| BREP VIII.F-NQ (AV-LH) | 531390 | 7,825. | | | |
| BREP VIII.F-NQ (AV-LH.2) | 531390 | -15512 | | | |
| BREP VIII.F-NQ (AV-LH.3) | | | 14 | -1,956. | |
| BREP VIII.F-NQ (AV-LH.3) | 531390 | -9419. | | | |
| BREP VIII.F-NQ (AV-LH.4) | 531390 | -5242. | | | |
| BREP VIII.F-NQ (AV-LH.4) | | | 14 | -3,416. | |
| DETROIT VENTURE PARTNERS | | | 14 | -11,039. | |
| ENERGY CAPITAL TE-L | | | | | |
| DIRECT | | | 14 | -312. | |
| ENERGY CAPITAL TE-L | 531390 | | | | |
| INDIRECT | | 542. | | | |
| ENERGY CAPITAL TE-L | | | | | |
| INDIRECT | | | 14 | -7,592. | |

| | | |
|---------------------------|--------|-------------|
| FORTRESS CREDIT | | |
| OPPORTUNITIES FUND (B) | 14 | 24,633. |
| FPA APARTMENT OPPORTUNITY | | |
| FUND V-A | 14 | -7,855. |
| FPA APARTMENT OPPORTUNITY | 531390 | |
| FUND V-A | | -1084. |
| FPA APARTMENT OPPORTUNITY | | |
| FUND VI A | 14 | -19,749. |
| FPA APARTMENT OPPORTUNITY | | |
| FUND VII-A | 14 | -26,795. |
| GSO ESOF FINANCE | 14 | -78. |
| KINDERHOOK CAPITAL FUND | | |
| IV-B LP | 14 | -1,802. |
| MAXIMUM PRIVATE GROWTH | 531390 | |
| FUND | | 214700 |
| MAXIMUM PRIVATE GROWTH | | |
| FUND | 14 | -1,253,775. |
| METROPOLITAN RE PARTNERS | | |
| INTERNATIONAL IV | 14 | 5,749. |
| METROPOLITAN RE PARTNERS | | |
| INT'L II | 14 | -3,999. |
| NEW MOUNTAIN PARTNERS III | 14 | -128. |
| PICO VENTURE PARTNERS III | 14 | -39,163. |
| PRAIRIE CAPITAL V | 14 | -7,461. |
| PRAIRIE CAPITAL V | 531390 | 23498. |
| RAM REALTY PARTNERS VI | 14 | -16,397. |
| SCULPTOR REAL ESTATE | 531390 | |
| PARALLEL FUND III A | | -171. |
| SCULPTOR REAL ESTATE | | |
| PARALLEL FUND III A | 14 | 38,120. |
| SQUARE MILE PARTNERS III | 531390 | |
| TE | | -2001. |
| TFG WAKKR 2012 FUND | 531390 | 29. |
| TFG WAKKR 2012 FUND | 14 | -50,460. |
| THIRD & GRAND INVESTORS, | 531390 | |
| LLC | | -442035 |
| THOMA BRAVO FUND XIII-A | | |
| LP | 14 | -47,265. |
| TRIDENT V LP | 14 | -6,511. |
| TRIDENT V LP | 531390 | 12891. |
| TFG HEDGE FUND II LLC | 14 | -103,728. |
| BLACKSTONE RE PARTNERS X | 531390 | -8704. |
| ILLUMEN CAPITAL II | 531390 | -8. |
| ALMANAC REALTY SECURITIES | 14 | -163,972. |
| ARTESIAN FARMS L3C | 14 | -231. |
| BLACKSTONE RE PARTNERS X | 531390 | |
| (AV-MH.3) | | -862. |
| BLACKSTONE RE PARTNERS X | 531390 | |
| (OFFSHORE) | | -5986. |
| BREP VII.F-NQ | 14 | -6. |
| BREP VII.F-NQ (AV-LH.2) | 14 | -24. |
| ETHOS CAPITAL INVESTMENTS | 531390 | |
| A LP | | -107078 |
| GSO ESOF FINANCE 2 | 14 | -148. |
| ILLUMEN CAPITAL II | 14 | -21,898. |
| NB RE SECONDARY | | |
| OPPORTUNITIES FUND II | 14 | -113,435. |

| | | | | |
|------------------------------------|--------|------------------|--------------------|----------------|
| NB SELECT OPPORTUNITES | 531390 | | | |
| FUND V | | -9286. | | |
| SQUARE MILE PARTNERS III | | | | |
| TE | | 14 | -6. | |
| THOMA BRAVO XV-A | | 14 | -74,639. | |
| BLACKSTONE RE PARTNERS X | | 14 | -1,070. | |
| BLACKSTONE RE PARTNERS X | | | | |
| (OFFSHORE) | | 14 | -17. | |
| BREP VIII.F (AV-LH.3) | | 14 | -210. | |
| ETHOS CAPITAL INVESTMENTS | | | | |
| A LP | | 14 | -173,754. | |
| NB SELECT OPPORTUNITES | | | | |
| FUND V | | 14 | -68,933. | |
| | | | | |
| TOTAL TO FORM 990-PF, PG 12, LN 11 | | <u>-331,556.</u> | <u>-1,856,414.</u> | <u>70,591.</u> |

2022 DEPRECIATION AND AMORTIZATION REPORT

FORM 990-PF PAGE 1

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| Asset No. | Description | Date Acquired | Method | Life | Conv | Line No. | Unadjusted Cost Or Basis | Bus % Excl | Section 179 Expense | * Reduction In Basis | Basis For Depreciation | Beginning Accumulated Depreciation | Current Sec 179 Expense | Current Year Deduction | Ending Accumulated Depreciation |
|-----------|-----------------------|---------------|--------|------|------|----------|--------------------------|------------|---------------------|----------------------|------------------------|------------------------------------|-------------------------|------------------------|---------------------------------|
| 30 | COMPUTER | 01/01/09 | SL | 5.00 | | 16 | 1,968. | | | | 1,968. | 1,970. | | 0. | 1,970. |
| 52 | LAPTOP COMPUTER | 06/14/10 | SL | 5.00 | | 16 | 2,000. | | | | 2,000. | 2,000. | | 0. | 2,000. |
| 63 | LAPTOP COMPUTER | 02/16/11 | SL | 5.00 | | 16 | 2,230. | | | | 2,230. | 2,230. | | 0. | 2,230. |
| 64 | LAPTOP COMPUTER | 08/29/11 | SL | 5.00 | | 16 | 1,970. | | | | 1,970. | 1,970. | | 0. | 1,970. |
| 65 | IPADS | 09/09/11 | SL | 5.00 | | 16 | 1,398. | | | | 1,398. | 1,259. | | 0. | 1,259. |
| 76 | COMPUTER | 05/13/09 | SL | 5.00 | | 16 | 1,011. | | | | 1,011. | 1,150. | | 0. | 1,150. |
| 77 | LAPTOP COMPUTER | 06/13/12 | SL | 5.00 | | 16 | 1,616. | | | | 1,616. | 1,616. | | 0. | 1,616. |
| 79 | LAPTOP COMPUTER | 12/14/12 | SL | 5.00 | | 16 | 2,099. | | | | 2,099. | 2,099. | | 0. | 2,099. |
| 80 | LAPTOP COMPUTER | 12/14/12 | SL | 5.00 | | 16 | 2,115. | | | | 2,115. | 2,115. | | 0. | 2,115. |
| 91 | IPADS | 05/17/13 | SL | 5.00 | | 16 | 905. | | | | 905. | 905. | | 0. | 905. |
| 92 | IPADS | 10/09/13 | SL | 5.00 | | 16 | 928. | | | | 928. | 928. | | 0. | 928. |
| 93 | CHAIRS | 02/06/13 | SL | 5.00 | | 16 | 2,386. | | | | 2,386. | 2,379. | | 0. | 2,379. |
| 105 | IPAD | 11/13/14 | SL | 5.00 | | 16 | 881. | | | | 881. | 881. | | 0. | 881. |
| 106 | LAPTOP COMPUTER | 11/13/14 | SL | 5.00 | | 16 | 1,190. | | | | 1,190. | 1,190. | | 0. | 1,190. |
| 107 | OFFICE FURNITURE | 04/01/14 | SL | 7.00 | | 16 | 25,921. | | | | 25,921. | 25,921. | | 0. | 25,921. |
| 108 | PHONES | 04/01/14 | SL | 7.00 | | 16 | 970. | | | | 970. | 970. | | 0. | 970. |
| 120 | HP ELITEBOOK COMPUTER | 03/16/15 | SL | 5.00 | | 16 | 1,533. | | | | 1,533. | 1,533. | | 0. | 1,533. |
| 121 | HP ELITEBOOK COMPUTER | 11/19/15 | SL | 5.00 | | 16 | 2,363. | | | | 2,363. | 2,363. | | 0. | 2,363. |

2022 DEPRECIATION AND AMORTIZATION REPORT

FORM 990-PF PAGE 1

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| Asset No. | Description | Date Acquired | Method | Life | Conv | Line No. | Unadjusted Cost Or Basis | Bus % Excl | Section 179 Expense | * Reduction In Basis | Basis For Depreciation | Beginning Accumulated Depreciation | Current Sec 179 Expense | Current Year Deduction | Ending Accumulated Depreciation |
|-----------|--|---------------|--------|------|------|----------|--------------------------|------------|---------------------|----------------------|------------------------|------------------------------------|-------------------------|------------------------|---------------------------------|
| 122 | HP ELITEBOOK COMPUTER | 03/01/16 | SL | 5.00 | | 16 | 2,555. | | | | 2,555. | 2,555. | | 0. | 2,555. |
| 123 | HP ELITEBOOK COMPUTER | 10/14/16 | SL | 5.00 | | 16 | 2,789. | | | | 2,789. | 2,789. | | 0. | 2,789. |
| 124 | HP ELITEBOOK COMPUTER | 12/21/16 | SL | 5.00 | | 16 | 2,904. | | | | 2,904. | 2,904. | | 0. | 2,904. |
| 125 | COMPUTER | 05/19/17 | SL | 5.00 | | 16 | 2,589. | | | | 2,589. | 2,417. | | 172. | 2,589. |
| 126 | HP ELITEBOOK COMPUTER | 02/22/18 | SL | 5.00 | | 16 | 2,908. | | | | 2,908. | 2,279. | | 582. | 2,861. |
| 127 | IPAD | 03/12/18 | SL | 5.00 | | 16 | 528. | | | | 528. | 406. | | 106. | 512. |
| 128 | MICROSOFT SURFACE LAPTOP | 07/13/18 | SL | 5.00 | | 16 | 2,744. | | | | 2,744. | 1,921. | | 549. | 2,470. |
| 129 | COMPUTER | 08/16/18 | SL | 5.00 | | 16 | 2,431. | | | | 2,431. | 1,661. | | 486. | 2,147. |
| 130 | NBS - OFFICE FURNITURE | 08/23/18 | SL | 7.00 | | 16 | 10,694. | | | | 10,694. | 5,221. | | 1,528. | 6,749. |
| 131 | ADDITIONAL PHONES | 09/10/18 | SL | 7.00 | | 16 | 1,937. | | | | 1,937. | 923. | | 277. | 1,200. |
| 133 | MICROSOFT SURFACE PRO 6 | 03/22/19 | SL | 5.00 | | 16 | 2,127. | | | | 2,127. | 1,206. | | 425. | 1,631. |
| 134 | HP ELITEBOOK 850 G4 | 05/03/19 | SL | 5.00 | | 16 | 2,101. | | | | 2,101. | 1,121. | | 420. | 1,541. |
| 135 | IPAD AND CASE | 07/15/19 | SL | 5.00 | | 16 | 498. | | | | 498. | 250. | | 100. | 350. |
| 136 | MICROSOFT SURFACE PRO 6 | 10/23/19 | SL | 5.00 | | 16 | 2,095. | | | | 2,095. | 943. | | 419. | 1,362. |
| 137 | APPLE IPAD WITH ACCESSORIES | 09/24/20 | SL | 5.00 | | 16 | 658. | | | | 658. | 176. | | 132. | 308. |
| 138 | HP 450 LAPTOP FOR KENYA AND CAMARRAH | 12/31/20 | SL | 5.00 | | 16 | 2,613. | | | | 2,613. | 567. | | 523. | 1,090. |
| 139 | HP 450 LAPTOP FOR ADMINISTRATIVE ASSISTANT | 03/22/21 | SL | 5.00 | | 16 | 1,573. | | | | 1,573. | 263. | | 315. | 578. |
| 140 | DOCKING STATION FOR HP LAPTOP | 12/31/21 | SL | 5.00 | | 16 | 683. | | | | 683. | 11. | | 137. | 148. |

2022 DEPRECIATION AND AMORTIZATION REPORT

FORM 990-PF PAGE 1

990-PF

| Asset No. | Description | Date Acquired | Method | Life | Conv | Line No. | Unadjusted Cost Or Basis | Bus % Excl | Section 179 Expense | * Reduction In Basis | Basis For Depreciation | Beginning Accumulated Depreciation | Current Sec 179 Expense | Current Year Deduction | Ending Accumulated Depreciation |
|-----------|--|---------------|--------|------|------|----------|--------------------------|------------|---------------------|----------------------|------------------------|------------------------------------|-------------------------|------------------------|---------------------------------|
| 141 | HP 450 LAPTOP-ERICKSON (TEMP E.A.) | 02/28/22 | SL | 5.00 | | 16 | 1,641. | | | | 1,641. | | | 301. | 301. |
| 142 | 10.2-INCH IPAD WI-FI 64 GB SPACE GRAY W/ KEYBOARD CASE | 07/19/22 | SL | 5.00 | | 16 | 508. | | | | 508. | | | 51. | 51. |
| 143 | HP PROBOOK 450GB 15" LAPTOP (CONNOR) | 08/28/22 | SL | 5.00 | | 16 | 1,475. | | | | 1,475. | | | 123. | 123. |
| 144 | MICROSOFT SURFACE PRO 7+ (ROWELL) | 09/20/22 | SL | 5.00 | | 16 | 2,182. | | | | 2,182. | | | 145. | 145. |
| 145 | NEW HP LAPTOP (TAPERT) | 11/23/22 | SL | 5.00 | | 16 | 1,641. | | | | 1,641. | | | 55. | 55. |
| 146 | DOCKING STATIONS (3) FOR HP LAPTOP (TAPERT) | 11/23/22 | SL | 5.00 | | 16 | 720. | | | | 720. | | | 24. | 24. |
| | * TOTAL 990-PF PG 1 DEPR | | | | | | 106,078. | | | | 106,078. | 81,092. | | 6,870. | 87,962. |
| | CURRENT YEAR ACTIVITY | | | | | | | | | | | | | | |
| | BEGINNING BALANCE | | | | | | 97,911. | | | 0. | 97,911. | 81,092. | | | 87,263. |
| | ACQUISITIONS | | | | | | 8,167. | | | 0. | 8,167. | 0. | | | 699. |
| | DISPOSITIONS/RETIRED | | | | | | 0. | | | 0. | 0. | 0. | | | 0. |
| | ENDING BALANCE | | | | | | 106,078. | | | 0. | 106,078. | 81,092. | | | 87,962. |
| | ENDING ACCUM DEPR | | | | | | | | | | | 87,962. | | | |
| | ENDING BOOK VALUE | | | | | | | | | | | 18,116. | | | |

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

Department of the Treasury
Internal Revenue Service

▶ **File a separate application for each return.**
▶ **Go to www.irs.gov/Form8868 for the latest information.**

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

| | | |
|--|--|---|
| Type or print | Name of exempt organization or other filer, see instructions. MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Taxpayer identification number (TIN) 38-1784340 |
| File by the due date for filing your return. See instructions. | Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | |
| | City, town or post office, state, and ZIP code. For a foreign address, see instructions. SOUTHFIELD, MI 48076 | |

Enter the Return Code for the return that this application is for (file a separate application for each return) 0 4

| Application Is For | Return Code | Application Is For | Return Code |
|--|-------------|-----------------------------------|-------------|
| Form 990 or Form 990-EZ | 01 | Form 1041-A | 08 |
| Form 4720 (individual) | 03 | Form 4720 (other than individual) | 09 |
| Form 990-PF | 04 | Form 5227 | 10 |
| Form 990-T (sec. 401(a) or 408(a) trust) | 05 | Form 6069 | 11 |
| Form 990-T (trust other than above) | 06 | Form 8870 | 12 |
| Form 990-T (corporation) | 07 | | |

EMILY DIEGEL

- The books are in the care of ▶ **TWO TOWNE SQUARE #900 - SOUTHFIELD, MI 48076**

Telephone No. ▶ **248-415-1440** Fax No. ▶ _____

- If the organization does not have an office or place of business in the United States, check this box
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) _____. If this is for the whole group, check this box . If it is for part of the group, check this box and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6-month extension of time until **NOVEMBER 15, 2023**, to file the exempt organization return for the organization named above. The extension is for the organization's return for:

- ▶ calendar year **2022** or
- ▶ tax year beginning _____, and ending _____.

2 If the tax year entered in line 1 is for less than 12 months, check reason: Initial return Final return Change in accounting period

| | | | |
|---|-----------|----|----------|
| 3a If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions. | 3a | \$ | 310,000. |
| b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. | 3b | \$ | 150,000. |
| c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions. | 3c | \$ | 160,000. |

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.

TAX RETURN FILING INSTRUCTIONS

FORM 990-T

FOR THE YEAR ENDING
DECEMBER 31, 2022

PREPARED FOR:

MS. EMILY DIEGEL
MAX M. & MARJORIE S. FISHER FOUNDATION
TWO TOWNE SQUARE 900
SOUTHFIELD, MI 48076

PREPARED BY:

PLANTE & MORAN, PLLC
2601 CAMBRIDGE CT., STE. 300
AUBURN HILLS, MI 48326

AMOUNT DUE OR REFUND:

OVERPAYMENT OF \$100,468. THE ENTIRE OVERPAYMENT HAS BEEN APPLIED TO THE ESTIMATED TAX PAYMENTS.

MAKE CHECK PAYABLE TO:

NO AMOUNT IS DUE.

MAIL TAX RETURN AND CHECK (IF APPLICABLE) TO:

NOT APPLICABLE

RETURN MUST BE MAILED ON OR BEFORE:

RETURN FORM 8879-TE TO US BY NOVEMBER 15, 2023.

SPECIAL INSTRUCTIONS:

THIS RETURN HAS QUALIFIED FOR ELECTRONIC FILING. AFTER YOU HAVE REVIEWED THE RETURN FOR COMPLETENESS AND ACCURACY, PLEASE SIGN, DATE AND RETURN FORM 8879-TE TO OUR OFFICE. WE WILL TRANSMIT THE RETURN ELECTRONICALLY TO THE IRS AND NO FURTHER ACTION IS REQUIRED.

Form **8879-TE**

IRS e-file Signature Authorization for a Tax Exempt Entity

OMB No. 1545-0047

For calendar year 2022, or fiscal year beginning _____, 2022, and ending _____, 20____

2022

Department of the Treasury
Internal Revenue Service

Do not send to the IRS. Keep for your records.

Go to www.irs.gov/Form8879TE for the latest information.

Name of filer **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.**

EIN or SSN
38-1784340

Name and title of officer or person subject to tax **DOUGLAS STEWART
EXECUTIVE DIRECTOR**

Part I Type of Return and Return Information

Check the box for the return for which you are using this Form 8879-TE and enter the applicable amount, if any, from the return. Form 8038-CP and Form 5330 filers may enter dollars and cents. For all other forms, enter whole dollars only. If you check the box on line 1a, 2a, 3a, 4a, 5a, 6a, 7a, 8a, 9a, or 10a below, and the amount on that line for the return being filed with this form was blank, then leave line 1b, 2b, 3b, 4b, 5b, 6b, 7b, 8b, 9b, or 10b, whichever is applicable, blank (do not enter -0-). But, if you entered -0- on the return, then enter -0- on the applicable line below. Do not complete more than one line in Part I.

| | | | |
|------------------------------------|-------------------------------------|---|--------------------------|
| 1a Form 990 check here | <input type="checkbox"/> | b Total revenue, if any (Form 990, Part VIII, column (A), line 12) | 1b _____ |
| 2a Form 990-EZ check here | <input type="checkbox"/> | b Total revenue, if any (Form 990-EZ, line 9) | 2b _____ |
| 3a Form 1120-POL check here | <input type="checkbox"/> | b Total tax (Form 1120-POL, line 22) | 3b _____ |
| 4a Form 990-PF check here | <input type="checkbox"/> | b Tax based on investment income (Form 990-PF, Part V, line 5) | 4b _____ |
| 5a Form 8868 check here | <input type="checkbox"/> | b Balance due (Form 8868, line 3c) | 5b _____ |
| 6a Form 990-T check here | <input checked="" type="checkbox"/> | b Total tax (Form 990-T, Part III, line 4) | 6b <u>24,522.</u> |
| 7a Form 4720 check here | <input type="checkbox"/> | b Total tax (Form 4720, Part III, line 1) | 7b _____ |
| 8a Form 5227 check here | <input type="checkbox"/> | b FMV of assets at end of tax year (Form 5227, Item D) | 8b _____ |
| 9a Form 5330 check here | <input type="checkbox"/> | b Tax due (Form 5330, Part II, line 19) | 9b _____ |
| 10a Form 8038-CP check here | <input type="checkbox"/> | b Amount of credit payment requested (Form 8038-CP, Part III, line 22) | 10b _____ |

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

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

PIN: check one box only

I authorize **PLANTE & MORAN, PLLC** to enter my PIN **12345**
ERO firm name Enter five numbers, but do not enter all zeros

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

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

Signature of officer or person subject to tax

Date **11/15/23**

Part III Certification and Authentication

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

38569213579

Do not enter all zeros

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

ERO's signature **PLANTE & MORAN, PLLC**

Date **11/08/23**

ERO Must Retain This Form - See Instructions

Do Not Submit This Form to the IRS Unless Requested To Do So

LHA For Privacy Act and Paperwork Reduction Act Notice, see instructions.

Form **8879-TE** (2022)

Exempt Organization Business Income Tax Return (and proxy tax under section 6033(e))

2022

Department of the Treasury
Internal Revenue Service

For calendar year 2022 or other tax year beginning _____, and ending _____

Go to www.irs.gov/Form990T for instructions and the latest information.

Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3).

Open to Public Inspection for
501(c)(3) Organizations Only

| | | | |
|---|------------------------------|--|---|
| <p>A <input type="checkbox"/> Check box if address changed.</p> <p>B Exempt under section <input checked="" type="checkbox"/> 501(c)(3) <input type="checkbox"/> 408(e) <input type="checkbox"/> 220(e) <input type="checkbox"/> 408A <input type="checkbox"/> 530(a) <input type="checkbox"/> 529(a) <input type="checkbox"/> 529A</p> | <p>Print or Type</p> | <p>Name of organization (<input type="checkbox"/> Check box if name changed and see instructions.) MAX M. & MARJORIE S. FISHER FOUNDATION, INC.</p> <p>Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900</p> <p>City or town, state or province, country, and ZIP or foreign postal code SOUTHFIELD, MI 48076</p> | <p>D Employer identification number 38-1784340</p> <p>E Group exemption number (see instructions)</p> <p>F <input type="checkbox"/> Check box if an amended return.</p> |
| <p>C Book value of all assets at end of year 279,901,104.</p> | | <p>G Check organization type <input checked="" type="checkbox"/> 501(c) corporation <input type="checkbox"/> 501(c) trust <input type="checkbox"/> 401(a) trust <input type="checkbox"/> Other trust <input type="checkbox"/> State college/university</p> <p>H Check if filing only to <input type="checkbox"/> Claim credit from Form 8941 <input type="checkbox"/> Claim a refund shown on Form 2439</p> <p>I Check if a 501(c)(3) organization filing a consolidated return with a 501(c)(2) titleholding corporation <input type="checkbox"/></p> <p>J Enter the number of attached Schedules A (Form 990-T) 1</p> <p>K During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," enter the name and identifying number of the parent corporation.</p> <p>L The books are in care of EMILY DIEGEL Telephone number 248-415-1440</p> | |

Part I Total Unrelated Business Taxable Income

| | | |
|--|----|----------|
| 1 Total of unrelated business taxable income computed from all unrelated trades or businesses (see instructions) | 1 | 130,744. |
| 2 Reserved | 2 | |
| 3 Add lines 1 and 2 | 3 | 130,744. |
| 4 Charitable contributions (see instructions for limitation rules) STMT 20 STMT 21 | 4 | 12,974. |
| 5 Total unrelated business taxable income before net operating losses. Subtract line 4 from line 3 | 5 | 117,770. |
| 6 Deduction for net operating loss. See instructions | 6 | |
| 7 Total of unrelated business taxable income before specific deduction and section 199A deduction. Subtract line 6 from line 5 | 7 | 117,770. |
| 8 Specific deduction (generally \$1,000, but see instructions for exceptions) | 8 | 1,000. |
| 9 Trusts. Section 199A deduction. See instructions | 9 | |
| 10 Total deductions. Add lines 8 and 9 | 10 | 1,000. |
| 11 Unrelated business taxable income. Subtract line 10 from line 7. If line 10 is greater than line 7, enter zero | 11 | 116,770. |

Part II Tax Computation

| | | |
|---|---|---------|
| 1 Organizations taxable as corporations. Multiply Part I, line 11 by 21% (0.21) | 1 | 24,522. |
| 2 Trusts taxable at trust rates. See instructions for tax computation. Income tax on the amount on Part I, line 11 from: <input type="checkbox"/> Tax rate schedule or <input type="checkbox"/> Schedule D (Form 1041) | 2 | |
| 3 Proxy tax. See instructions | 3 | |
| 4 Other tax amounts. See instructions | 4 | |
| 5 Alternative minimum tax (trusts only) | 5 | |
| 6 Tax on noncompliant facility income. See instructions | 6 | |
| 7 Total. Add lines 3 through 6 to line 1 or 2, whichever applies | 7 | 24,522. |

LHA For Paperwork Reduction Act Notice, see instructions.

| Part III Tax and Payments | | | | |
|----------------------------------|--|-----------|----------|----------|
| 1a | Foreign tax credit (corporations attach Form 1118; trusts attach Form 1116) | 1a | | |
| b | Other credits (see instructions) | 1b | | |
| c | General business credit. Attach Form 3800 (see instructions) | 1c | | |
| d | Credit for prior year minimum tax (attach Form 8801 or 8827) | 1d | | |
| e | Total credits. Add lines 1a through 1d | 1e | | |
| 2 | Subtract line 1e from Part II, line 7 | 2 | | 24,522. |
| 3 | Other amounts due. Check if from: <input type="checkbox"/> Form 4255 <input type="checkbox"/> Form 8611 <input type="checkbox"/> Form 8697 <input type="checkbox"/> Form 8866 <input type="checkbox"/> Other (attach statement) | 3 | | |
| 4 | Total tax. Add lines 2 and 3 (see instructions). <input type="checkbox"/> Check if includes tax previously deferred under section 1294. Enter tax amount here | 4 | | 24,522. |
| 5 | Current net 965 tax liability paid from Form 965-A, Part II, column (k) | 5 | | 0. |
| 6a | Payments: A 2021 overpayment credited to 2022 | 6a | | |
| b | 2022 estimated tax payments. Check if section 643(g) election applies <input type="checkbox"/> | 6b | 125,000. | |
| c | Tax deposited with Form 8868 | 6c | | |
| d | Foreign organizations: Tax paid or withheld at source (see instructions) | 6d | | |
| e | Backup withholding (see instructions) | 6e | | |
| f | Credit for small employer health insurance premiums (attach Form 8941) | 6f | | |
| g | Other credits, adjustments, and payments: <input type="checkbox"/> Form 2439 <input type="checkbox"/> Form 4136 <input type="checkbox"/> Other _____ Total | 6g | | |
| 7 | Total payments. Add lines 6a through 6g | 7 | | 125,000. |
| 8 | Estimated tax penalty (see instructions). Check if Form 2220 is attached <input checked="" type="checkbox"/> | 8 | | 10. |
| 9 | Tax due. If line 7 is smaller than the total of lines 4, 5, and 8, enter amount owed | 9 | | |
| 10 | Overpayment. If line 7 is larger than the total of lines 4, 5, and 8, enter amount overpaid | 10 | | 100,468. |
| 11 | Enter the amount of line 10 you want: Credited to 2023 estimated tax 100,468. Refunded | 11 | | 0. |

| Part IV Statements Regarding Certain Activities and Other Information (see instructions) | | | |
|---|--|-----------------------------------|-----------|
| 1 | At any time during the 2022 calendar year, did the organization have an interest in or a signature or other authority over a financial account (bank, securities, or other) in a foreign country? If "Yes," the organization may have to file FinCEN Form 114, Report of Foreign Bank and Financial Accounts. If "Yes," enter the name of the foreign country here SEE STATEMENT 22 | Yes | No |
| 2 | During the tax year, did the organization receive a distribution from, or was it the grantor of, or transferor to, a foreign trust? If "Yes," see instructions for other forms the organization may have to file. | | X |
| 3 | Enter the amount of tax-exempt interest received or accrued during the tax year \$ _____ | | |
| 4 | Enter available pre-2018 NOL carryovers here \$ _____ Do not include any post-2017 NOL carryover shown on Schedule A (Form 990-T). Don't reduce the NOL carryover shown here by any deduction reported on Part I, line 6. | | |
| 5 | Post-2017 NOL carryovers. Enter the Business Activity Code and available post-2017 NOL carryovers. Don't reduce the amounts shown below by any NOL claimed on any Schedule A, Part II, line 17 for the tax year. See instructions. | | |
| | Business Activity Code | Available post-2017 NOL carryover | |
| | 211100 | \$ 860,959. | |
| | | \$ | |
| 6a | Did the organization change its method of accounting? (see instructions) | | X |
| b | If 6a is "Yes," has the organization described the change on Form 990, 990-EZ, 990-PF, or Form 1128? If "No," explain in Part V | | |

Part V Supplemental Information

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

| | | | | |
|-------------------------------|--|----------------------|--------------------|---|
| 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, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge. | | | |
| | Signature of officer | Date | EXECUTIVE DIRECTOR | |
| | | | | May the IRS discuss this return with the preparer shown below (see instructions)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Paid Preparer Use Only | Print/Type preparer's name | Preparer's signature | Date | Check <input type="checkbox"/> if self-employed PTIN |
| | DORI J. EGGETT | DORI J. EGGETT | 11/08/23 | P00645252 |
| | Firm's name | Firm's EIN | | |
| | PLANTE & MORAN, PLLC | 38-1357951 | | |
| | Firm's address | | Phone no. | |
| | 2601 CAMBRIDGE CT., STE. 300 AUBURN HILLS, MI 48326 | | (248) 375-7100 | |

FORM 990-T

CONTRIBUTIONS

STATEMENT 20

| DESCRIPTION/KIND OF PROPERTY | METHOD USED TO DETERMINE FMV | AMOUNT |
|-------------------------------------|------------------------------|-------------|
| CONTRIBUTIONS FROM K-1 ACTIVITY | N/A | 1,314. |
| GRANTS PAID | N/A | 14,593,884. |
| TOTAL TO FORM 990-T, PART I, LINE 4 | | 14,595,198. |

FORM 990-T

CONTRIBUTIONS SUMMARY

STATEMENT 21

QUALIFIED CONTRIBUTIONS SUBJECT TO 100% LIMIT
 QUALIFIED CONTRIBUTIONS SUBJECT TO 25% LIMIT

CARRYOVER OF PRIOR YEARS UNUSED CONTRIBUTIONS
 FOR TAX YEAR 2017 11,632,617
 FOR TAX YEAR 2018 13,956,064
 FOR TAX YEAR 2019 15,180,685
 FOR TAX YEAR 2020 17,031,192
 FOR TAX YEAR 2021 14,296,044

TOTAL CARRYOVER 72,096,602
 TOTAL CURRENT YEAR 10% CONTRIBUTIONS 14,595,198

TOTAL CONTRIBUTIONS AVAILABLE 86,691,800
 TAXABLE INCOME LIMITATION AS ADJUSTED 12,974

EXCESS CONTRIBUTIONS 86,678,826
 EXCESS 100% CONTRIBUTIONS 0
 TOTAL EXCESS CONTRIBUTIONS 86,678,826

ALLOWABLE CONTRIBUTIONS DEDUCTION 12,974

TOTAL CONTRIBUTION DEDUCTION 12,974

FORM 990-T

NAME OF FOREIGN COUNTRY IN WHICH
ORGANIZATION HAS FINANCIAL INTEREST

STATEMENT 22

NAME OF COUNTRY

CAYMAN ISLANDS
GUERNSEY
JERSEY
GERMANY

**SCHEDULE A
(Form 990-T)**

Department of the Treasury
Internal Revenue Service

**Unrelated Business Taxable Income
From an Unrelated Trade or Business**

Go to www.irs.gov/Form990T for instructions and the latest information.
Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3).

1

OMB No. 1545-0047

2022

Open to Public Inspection for
501(c)(3) Organizations Only

| | |
|---|--|
| A Name of the organization MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | B Employer identification number 38-1784340 |
| C Unrelated business activity code (see instructions) 211100 | D Sequence: 1 of 1 |

E Describe the unrelated trade or business **PARTNERSHIP INCOME**

| Part I Unrelated Trade or Business Income | (A) Income | (B) Expenses | (C) Net |
|---|------------|--------------|-----------|
| 1 a Gross receipts or sales _____ | | | |
| b Less returns and allowances _____ c Balance | 1c | | |
| 2 Cost of goods sold (Part III, line 8) | 2 | | |
| 3 Gross profit. Subtract line 2 from line 1c | 3 | | |
| 4 a Capital gain net income (attach Schedule D (Form 1041 or Form 1120)). See instructions | 997,042. | | 997,042. |
| b Net gain (loss) (Form 4797) (attach Form 4797). See instructions) | 4b | | |
| c Capital loss deduction for trusts | 4c | | |
| 5 Income (loss) from a partnership or an S corporation (attach statement) STATEMENT 23 | -331,556. | | -331,556. |
| 6 Rent income (Part IV) | 6 | | |
| 7 Unrelated debt-financed income (Part V) | 7 | | |
| 8 Interest, annuities, royalties, and rents from a controlled organization (Part VI) | 8 | | |
| 9 Investment income of section 501(c)(7), (9), or (17) organizations (Part VII) | 9 | | |
| 10 Exploited exempt activity income (Part VIII) | 10 | | |
| 11 Advertising income (Part IX) | 11 | | |
| 12 Other income (see instructions; attach statement) | 12 | | |
| 13 Total. Combine lines 3 through 12 | 665,486. | | 665,486. |

Part II Deductions Not Taken Elsewhere See instructions for limitations on deductions. Deductions must be directly connected with the unrelated business income

| | | |
|--|-----------|-----------|
| 1 Compensation of officers, directors, and trustees (Part X) | 1 | |
| 2 Salaries and wages | 2 | |
| 3 Repairs and maintenance | 3 | |
| 4 Bad debts | 4 | |
| 5 Interest (attach statement). See instructions | 5 | |
| 6 Taxes and licenses | 6 | 11,766. |
| 7 Depreciation (attach Form 4562). See instructions | 7 | |
| 8 Less depreciation claimed in Part III and elsewhere on return | 8a | 8b |
| 9 Depletion | 9 | |
| 10 Contributions to deferred compensation plans | 10 | |
| 11 Employee benefit programs | 11 | |
| 12 Excess exempt expenses (Part VIII) | 12 | |
| 13 Excess readership costs (Part IX) | 13 | |
| 14 Other deductions (attach statement) | 14 | |
| 15 Total deductions. Add lines 1 through 14 | 15 | 11,766. |
| 16 Unrelated business income before net operating loss deduction. Subtract line 15 from Part I, line 13, column (C) | 16 | 653,720. |
| 17 Deduction for net operating loss. See instructions | 17 | 522,976. |
| 18 Unrelated business taxable income. Subtract line 17 from line 16 | 18 | 130,744. |

LHA For Paperwork Reduction Act Notice, see instructions.

Schedule A (Form 990-T) 2022

Part III Cost of Goods Sold Enter method of inventory valuation

| | | |
|---|---|--|
| 1 Inventory at beginning of year | 1 | |
| 2 Purchases | 2 | |
| 3 Cost of labor | 3 | |
| 4 Additional section 263A costs (attach statement) | 4 | |
| 5 Other costs (attach statement) | 5 | |
| 6 Total. Add lines 1 through 5 | 6 | |
| 7 Inventory at end of year | 7 | |
| 8 Cost of goods sold. Subtract line 7 from line 6. Enter here and in Part I, line 2 | 8 | |
| 9 Do the rules of section 263A (with respect to property produced or acquired for resale) apply to the organization? <input type="checkbox"/> Yes <input type="checkbox"/> No | | |

Part IV Rent Income (From Real Property and Personal Property Leased with Real Property)

1 Description of property (property street address, city, state, ZIP code). Check if a dual-use. See instructions.

A _____

B _____

C _____

D _____

| | A | B | C | D |
|---|---|---|---|----|
| 2 Rent received or accrued | | | | |
| a From personal property (if the percentage of rent for personal property is more than 10% but not more than 50%) | | | | |
| b From real and personal property (if the percentage of rent for personal property exceeds 50% or if the rent is based on profit or income) | | | | |
| c Total rents received or accrued by property. Add lines 2a and 2b, columns A through D | | | | |
| 3 Total rents received or accrued. Add line 2c columns A through D. Enter here and on Part I, line 6, column (A) | | | | 0. |
| 4 Deductions directly connected with the income in lines 2(a) and 2(b) (attach statement) | | | | |
| 5 Total deductions. Add line 4 columns A through D. Enter here and on Part I, line 6, column (B) | | | | 0. |

Part V Unrelated Debt-Financed Income (see instructions)

1 Description of debt-financed property (street address, city, state, ZIP code). Check if a dual-use. See instructions.

A _____

B _____

C _____

D _____

| | A | B | C | D |
|---|---|---|---|----|
| 2 Gross income from or allocable to debt-financed property | | | | |
| 3 Deductions directly connected with or allocable to debt-financed property | | | | |
| a Straight line depreciation (attach statement) | | | | |
| b Other deductions (attach statement) | | | | |
| c Total deductions (add lines 3a and 3b, columns A through D) | | | | |
| 4 Amount of average acquisition debt on or allocable to debt-financed property (attach statement) | | | | |
| 5 Average adjusted basis of or allocable to debt-financed property (attach statement) | | | | |
| 6 Divide line 4 by line 5 | % | % | % | % |
| 7 Gross income reportable. Multiply line 2 by line 6 | | | | |
| 8 Total gross income (add line 7, columns A through D). Enter here and on Part I, line 7, column (A) | | | | 0. |
| 9 Allocable deductions. Multiply line 3c by line 6 | | | | |
| 10 Total allocable deductions. Add line 9, columns A through D. Enter here and on Part I, line 7, column (B) | | | | 0. |
| 11 Total dividends-received deductions included in line 10 | | | | 0. |

Part VI Interest, Annuities, Royalties, and Rents from Controlled Organizations (see instructions)

| 1. Name of controlled organization | | 2. Employer identification number | Exempt Controlled Organizations | | | 6. Deductions directly connected with income in column 5 |
|------------------------------------|---|-------------------------------------|--|--|---|--|
| | | | 3. Net unrelated income (loss) (see instructions) | 4. Total of specified payments made | 5. Part of column 4 that is included in the controlling organization's gross income | |
| (1) | | | | | | |
| (2) | | | | | | |
| (3) | | | | | | |
| (4) | | | | | | |
| Nonexempt Controlled Organizations | | | | | | |
| 7. Taxable Income | 8. Net unrelated income (loss) (see instructions) | 9. Total of specified payments made | 10. Part of column 9 that is included in the controlling organization's gross income | 11. Deductions directly connected with income in column 10 | | |
| (1) | | | | | | |
| (2) | | | | | | |
| (3) | | | | | | |
| (4) | | | | | | |
| | | | Add columns 5 and 10. Enter here and on Part I, line 8, column (A) | Add columns 6 and 11. Enter here and on Part I, line 8, column (B) | | |
| Totals | | | 0. | 0. | | |

Part VII Investment Income of a Section 501(c)(7), (9), or (17) Organization (see instructions)

| 1. Description of income | 2. Amount of income | 3. Deductions directly connected (attach statement) | 4. Set-asides (attach statement) | 5. Total deductions and set-asides (add cols 3 and 4) |
|--------------------------|---------------------|---|----------------------------------|---|
| (1) | | | | |
| (2) | | | | |
| (3) | | | | |
| (4) | | | | |
| | | Add amounts in column 2. Enter here and on Part I, line 9, column (A) | | Add amounts in column 5. Enter here and on Part I, line 9, column (B) |
| Totals | | 0. | | 0. |

Part VIII Exploited Exempt Activity Income, Other Than Advertising Income (see instructions)

| | | | |
|---|--|---|--|
| 1 | Description of exploited activity: _____ | | |
| 2 | Gross unrelated business income from trade or business. Enter here and on Part I, line 10, column (A) | 2 | |
| 3 | Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (B) | 3 | |
| 4 | Net income (loss) from unrelated trade or business. Subtract line 3 from line 2. If a gain, complete lines 5 through 7 | 4 | |
| 5 | Gross income from activity that is not unrelated business income | 5 | |
| 6 | Expenses attributable to income entered on line 5 | 6 | |
| 7 | Excess exempt expenses. Subtract line 5 from line 6, but do not enter more than the amount on line 4. Enter here and on Part II, line 12 | 7 | |

Part IX Advertising Income

1 Name(s) of periodical(s). Check box if reporting two or more periodicals on a consolidated basis.

- A B C D checkboxes

Enter amounts for each periodical listed above in the corresponding column.

Table with 4 columns (A, B, C, D) and 2 rows for Gross advertising income and its total.

Table with 4 columns (A, B, C, D) and 2 rows for Direct advertising costs and its total.

4 Advertising gain (loss). Subtract line 3 from line 2. For any column in line 4 showing a gain, complete lines 5 through 8. For any column in line 4 showing a loss or zero, do not complete lines 5 through 7, and enter zero on line 8

5 Readership costs
6 Circulation income
7 Excess readership costs. If line 6 is less than line 5, subtract line 6 from line 5. If line 5 is less than line 6, enter zero
8 Excess readership costs allowed as a deduction. For each column showing a gain on line 4, enter the lesser of line 4 or line 7

Table with 4 columns (A, B, C, D) for lines 4 through 8.

a Add line 8, columns A through D. Enter the greater of the line 8a, columns total or zero here and on Part II, line 13

Part X Compensation of Officers, Directors, and Trustees (see instructions)

Table with 4 columns: 1. Name, 2. Title, 3. Percentage of time devoted to business, 4. Compensation attributable to unrelated business. Includes rows (1) through (4).

Total. Enter here and on Part II, line 1

Part XI Supplemental Information (see instructions)

Multiple horizontal lines for supplemental information.

FORM 990-T (A)

INCOME (LOSS) FROM PARTNERSHIPS

STATEMENT 23

| DESCRIPTION | NET INCOME OR (LOSS) |
|---|-------------------------|
| BREP VIII.F (AV-LH.2) - ORDINARY BUSINESS INCOME (LOSS) | 6. |
| BLACKSTONE RE PARTNERS VII.F (AV-LH.4) - ORDINARY BUSINESS INCOME (LOSS) | -7,501. |
| BREP VIII.F (AV-LH.3) - ORDINARY BUSINESS INCOME (LOSS) | -3,070. |
| BREP VIII.F (AV-LH.3) - OTHER INCOME (LOSS) | -1,642. |
| BREP VIII.F-NQ (AV-LH.2) - ORDINARY BUSINESS INCOME (LOSS) | -15,512. |
| TFG WAKKR 2012 FUND - ORDINARY BUSINESS INCOME (LOSS) | 29. |
| BLACKSTONE RE PARTNERS VII.F (AV-LH) - ORDINARY BUSINESS INCOME (LOSS) | -2,143. |
| BREP VIII.F (AV-LH.4) - ORDINARY BUSINESS INCOME (LOSS) | -6,614. |
| BREP VIII.F-NQ (AV-LH.3) - ORDINARY BUSINESS INCOME (LOSS) | -9,419. |
| BREP VIII.F-NQ (AV-LH) - ORDINARY BUSINESS INCOME (LOSS) | 7,825. |
| ENERGY CAPITAL TE-L INDIRECT - ORDINARY BUSINESS INCOME (LOSS) | 542. |
| BLACKSTONE RE PARTNERS VI - ORDINARY BUSINESS INCOME (LOSS) | 2. |
| BLACKSTONE RE PARTNERS VII.F-NQ (AV-LH.3) - ORDINARY BUSINESS INCOME (LOSS) | -11,060. |
| BLACKSTONE RE PARTNERS VI-NQ - ORDINARY BUSINESS INCOME (LOSS) | 2,754. |
| BLACKSTONE RE PARTNERS VII.F-NQ (AV-LH.4) - ORDINARY BUSINESS INCOME (LOSS) | 52,445. |
| SQUARE MILE PARTNERS III TE - ORDINARY BUSINESS INCOME (LOSS) | -2,001. |
| BLACKSTONE RE PARTNERS V - ORDINARY BUSINESS INCOME (LOSS) | 45. |
| TRIDENT V LP - ORDINARY BUSINESS INCOME (LOSS) | 13,371. |
| TRIDENT V LP - OTHER INCOME (LOSS) | -480. |
| SCULPTOR REAL ESTATE PARALLEL FUND III A - ORDINARY BUSINESS INCOME (LOSS) | -171. |
| PRAIRIE CAPITAL V - ORDINARY BUSINESS INCOME (LOSS) | 23,498. |
| BREP VIII.F (AV-LH) - ORDINARY BUSINESS INCOME (LOSS) | -6,992. |
| BREP VIII.F-NQ (AV-LH.4) - ORDINARY BUSINESS INCOME (LOSS) | -5,242. |
| THIRD & GRAND INVESTORS, LLC - ORDINARY BUSINESS INCOME (LOSS) | -442,035. |
| BREP VIII.F - ORDINARY BUSINESS INCOME (LOSS) | 117. |
| MAXIMUM PRIVATE GROWTH FUND - ORDINARY BUSINESS INCOME (LOSS) | 214,700. |
| BLACKSTONE RE PARTNERS X.F - OTHER INCOME (LOSS) | -8,704. |
| BLACKSTONE RE PARTNERS X.TE-F (OFFSHORE) (CAN) - OTHER INCOME (LOSS) | -5,986. |
| FPA APARTMENT OPPORTUNITY FUND V-A - ORDINARY BUSINESS INCOME (LOSS) | -1,084. |
| ILLUMEN CAPITAL II - ORDINARY BUSINESS INCOME (LOSS) | -8. |
| NB SELECT OPPORTUNITIES FUND V LP - OTHER PORTFOLIO INCOME (LOSS) | -1. |
| NB SELECT OPPORTUNITIES FUND V LP - OTHER INCOME (LOSS) | -9,285. |
| BLACKSTONE RE PARTNERS X.F (AV-MH.3) L.P. - OTHER INCOME (LOSS) | -862. |
| ETHOS CAPITAL INVESTMENTS A LP - OTHER INCOME (LOSS) | -107,078. |

TOTAL INCLUDED ON SCHEDULE A, PART I, LINE 5

-331,556.

FORM 990-T (A) POST 2017 NOL SCHEDULE STATEMENT 24

| PRIOR YEAR POST 2017 NOL | NOL DEDUCTION | CARRYFORWARD OF POST 2017 NOL |
|-----------------------------|---------------|----------------------------------|
| 860,959. | 522,976. | 337,983. |

990-T SCH A POST-2017 NET OPERATING LOSS DEDUCTION STATEMENT 25

| TAX YEAR | LOSS SUSTAINED | LOSS PREVIOUSLY APPLIED | LOSS REMAINING | AVAILABLE THIS YEAR |
|-----------------------------------|----------------|-------------------------------|-------------------|------------------------|
| 12/31/18 | 136,726. | 136,726. | 0. | 0. |
| 12/31/19 | 321,532. | 166,162. | 155,370. | 155,370. |
| 12/31/20 | 705,589. | 0. | 705,589. | 705,589. |
| NOL CARRYOVER AVAILABLE THIS YEAR | | | 860,959. | 860,959. |

SCH A (990-T) SCHEDULE A NOL DETAIL STATEMENT 26

| | |
|--|----------|
| TAXABLE INCOME FROM ALL ENTITIES | 653,720. |
| THIS ENTITIES PORTION OF TAXABLE INCOME | 653,720. |
| THIS ENTITIES PERCENTAGE OF PRE-2018 NET OPERATING LOSS | 100.00% |
| THIS ENTITIES ALLOWED PRE-2018 NET OPERATING LOSS | 0. |
| TAXABLE INCOME AFTER PRE-2018 NET OPERATING LOSS | 653,720. |
| 80% INCOME LIMITATION | 522,976. |
| POST-2017 AVAILABLE | 860,959. |
| LESSER OF POST-2017 NET OPERATING LOSS OR 80% LIMITATION | 522,976. |

**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.
Go to www.irs.gov/Form1120 for instructions and the latest information.

OMB No. 1545-0123

2022

| | |
|---|---|
| Name MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Employer identification number 38-1784340 |
|---|---|

Did the corporation dispose of any investment(s) in a qualified opportunity fund during the tax year? Yes No
If "Yes," attach Form 8949 and see its instructions for additional requirements for reporting your gain or loss.

Part I Short-Term Capital Gains and Losses - Assets Held One Year or Less

| 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) Cost (or other basis) | (g) Adjustments to gain or loss from Form(s) 8949, Part I, line 2, column (g) | (h) Gain or (loss) Subtract column (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 | | | | |
| 3 Totals for all transactions reported on Form(s) 8949 with Box C checked | | | | |
| 4 Short-term capital gain from installment sales from Form 6252, line 26 or 37 | | | | 4 |
| 5 Short-term capital gain or (loss) from like-kind exchanges from Form 8824 | | | | 5 |
| 6 Unused capital loss carryover (attach computation) | | | | 6 () |
| 7 Net short-term capital gain or (loss). Combine lines 1a through 6 in column h | | | | 7 |

Part II Long-Term Capital Gains and Losses - Assets Held More Than One Year

| 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) Cost (or other basis) | (g) Adjustments to gain or loss from Form(s) 8949, Part II, line 2, column (g) | (h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g) |
|---|----------------------------------|---------------------------------|--|--|
| 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b | | | | |
| 8b Totals for all transactions reported on 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 | | | | 74,872. |
| 11 Enter gain from Form 4797, line 7 or 9 | | | | 11 922,170. |
| 12 Long-term capital gain from installment sales from Form 6252, line 26 or 37 | | | | 12 |
| 13 Long-term capital gain or (loss) from like-kind exchanges from Form 8824 | | | | 13 |
| 14 Capital gain distributions | | | | 14 |
| 15 Net long-term capital gain or (loss). Combine lines 8a through 14 in column h | | | | 15 997,042. |

Part III Summary of Parts I and II

| | | |
|--|-----------|-----------------|
| 16 Enter excess of net short-term capital gain (line 7) over net long-term capital loss (line 15) | 16 | |
| 17 Net capital gain. Enter excess of net long-term capital gain (line 15) over net short-term capital loss (line 7) | 17 | 997,042. |
| 18 Add lines 16 and 17. Enter here and on Form 1120, page 1, line 8, or the applicable line on other returns | 18 | 997,042. |

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

Sales of Business Property
(Also Involuntary Conversions and Recapture Amounts
Under Sections 179 and 280F(b)(2))

Attach to your tax return.

Go to www.irs.gov/Form4797 for instructions and the latest information.

Name(s) shown on return

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

Identifying number

38-1784340

- 1a** Enter the gross proceeds from sales or exchanges reported to you for 2022 on Form(s) 1099-B or 1099-S (or substitute statement) that you are including on line 2, 10, or 20
- b** Enter the total amount of gain that you are including on lines 2, 10, and 24 due to the partial dispositions of MACRS assets
- c** Enter the total amount of loss that you are including on lines 2 and 10 due to the partial dispositions of MACRS assets

1a
1b
1c

Part I Sales or Exchanges of Property Used in a Trade or Business and Involuntary Conversions From Other Than Casualty or Theft-Most Property Held More Than 1 Year (see instructions)

| 2 | (a) Description of property | (b) Date acquired (mo., day, yr.) | (c) Date sold (mo., day, yr.) | (d) Gross sales price | (e) Depreciation allowed or allowable since acquisition | (f) Cost or other basis, plus improvements and expense of sale | (g) Gain or (loss) Subtract (f) from the sum of (d) and (e) |
|---|-----------------------------|-----------------------------------|-------------------------------|-----------------------|---|--|---|
| | SEE STATEMENT 27 | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

- 3** Gain, if any, from Form 4684, line 39
- 4** Section 1231 gain from installment sales from Form 6252, line 26 or 37
- 5** Section 1231 gain or (loss) from like-kind exchanges from Form 8824
- 6** Gain, if any, from line 32, from other than casualty or theft
- 7** Combine lines 2 through 6. Enter the gain or (loss) here and on the appropriate line as follows

3
4
5
6
7 **922,170.**

Partnerships and S corporations. Report the gain or (loss) following the instructions for Form 1065, Schedule K, line 10, or Form 1120-S, Schedule K, line 9. Skip lines 8, 9, 11, and 12 below.

Individuals, partners, S corporation shareholders, and all others. If line 7 is zero or a loss, enter the amount from line 7 on line 11 below and skip lines 8 and 9. If line 7 is a gain and you didn't have any prior year section 1231 losses, or they were recaptured in an earlier year, enter the gain from line 7 as a long-term capital gain on the Schedule D filed with your return and skip lines 8, 9, 11, and 12 below.

- 8** Nonrecaptured net section 1231 losses from prior years. See instructions
- 9** Subtract line 8 from line 7. If zero or less, enter -0-. If line 9 is zero, enter the gain from line 7 on line 12 below. If line 9 is more than zero, enter the amount from line 8 on line 12 below and enter the gain from line 9 as a long-term capital gain on the Schedule D filed with your return. See instructions

8
9 **922,170.**

Part II Ordinary Gains and Losses (see instructions)

10 Ordinary gains and losses not included on lines 11 through 16 (include property held 1 year or less):

| 11 | 12 | 13 | 14 | 15 | 16 | 17 |
|----|----|----|----|----|----|----|
| | | | | | | |
| | | | | | | |
| | | | | | | |

- 11** Loss, if any, from line 7
- 12** Gain, if any, from line 7 or amount from line 8, if applicable
- 13** Gain, if any, from line 31
- 14** Net gain or (loss) from Form 4684, lines 31 and 38a
- 15** Ordinary gain from installment sales from Form 6252, line 25 or 36
- 16** Ordinary gain or (loss) from like-kind exchanges from Form 8824
- 17** Combine lines 10 through 16
- 18** For all except individual returns, enter the amount from line 17 on the appropriate line of your return and skip lines a and b below. For individual returns, complete lines a and b below.
 - a** If the loss on line 11 includes a loss from Form 4684, line 35, column (b)(ii), enter that part of the loss here. Enter the loss from income-producing property on Schedule A (Form 1040), line 16. (Do not include any loss on property used as an employee.) Identify as from "Form 4797, line 18a." See instructions
 - b** Redetermine the gain or (loss) on line 17 excluding the loss, if any, on line 18a. Enter here and on Schedule 1 (Form 1040), Part I, line 4

11 ()
12
13
14
15
16
17
18a
18b

LHA For Paperwork Reduction Act Notice, see separate instructions.

Part III Gain From Disposition of Property Under Sections 1245, 1250, 1252, 1254, and 1255 (see instructions)

| 19 (a) Description of section 1245, 1250, 1252, 1254, or 1255 property: | | (b) Date acquired (mo., day, yr.) | (c) Date sold (mo., day, yr.) |
|---|--|--------------------------------------|----------------------------------|
| A | | | |
| B | | | |
| C | | | |
| D | | | |
| These columns relate to the properties on lines 19A through 19D. | | | |
| | | Property A | Property B |
| | | Property C | Property D |
| 20 | Gross sales price (Note: See line 1a 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: | | |
| a | 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. | | |
| a | Additional depreciation after 1975. See instructions | 26a | |
| b | Applicable percentage multiplied by the smaller of line 24 or line 26a. See instructions | 26b | |
| c | Subtract line 26a from line 24. If residential rental property or line 24 isn't more than line 26a, skip lines 26d and 26e | 26c | |
| d | Additional depreciation after 1969 and before 1976 | 26d | |
| e | Enter the smaller of line 26c or 26d | 26e | |
| f | Section 291 amount (corporations only) | 26f | |
| g | Add lines 26b, 26e, and 26f | 26g | |
| 27 | If section 1252 property: Skip this section if you didn't dispose of farmland or if this form is being completed for a partnership. | | |
| a | Soil, water, and land clearing expenses | 27a | |
| b | Line 27a multiplied by applicable percentage | 27b | |
| c | Enter the smaller of line 24 or 27b | 27c | |
| 28 | If section 1254 property: | | |
| a | Intangible drilling and development costs, expenditures for development of mines and other natural deposits, mining exploration costs, and depletion. See instructions | 28a | |
| b | Enter the smaller of line 24 or 28a | 28b | |
| 29 | If section 1255 property: | | |
| a | 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 | |

Summary of Part III Gains. Complete property columns A through D through line 29b before going to line 30.

| | | | |
|----|---|----|--|
| 30 | Total gains for all properties. Add property columns A through D, line 24 | 30 | |
| 31 | Add property columns A through D, lines 25b, 26g, 27c, 28b, and 29b. Enter here and on line 13 | 31 | |
| 32 | Subtract line 31 from line 30. Enter the portion from casualty or theft on Form 4684, line 33. Enter the portion from other than casualty or theft on Form 4797, line 6 | 32 | |

Part IV Recapture Amounts Under Sections 179 and 280F(b)(2) When Business Use Drops to 50% or Less (see instructions)

| | | (a) Section 179 | (b) Section 280F(b)(2) |
|----|---|-----------------|------------------------|
| 33 | Section 179 expense deduction or depreciation allowable in prior years | 33 | |
| 34 | Recomputed depreciation. See instructions | 34 | |
| 35 | Recapture amount. Subtract line 34 from line 33. See the instructions for where to report | 35 | |

FORM 4797

PROPERTY HELD MORE THAN ONE YEAR

STATEMENT 27

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | SALES PRICE | DEPR. | COST OR BASIS | GAIN OR LOSS |
|--|------------------|--------------|----------------|-------|------------------|-----------------|
| BLACKSTONE RE PARTNERS V.TE.2 | VARIOUS | VARIOUS | | | | 3,512. |
| BLACKSTONE RE PARTNERS VI.TE.2 | VARIOUS | VARIOUS | | | | 64. |
| BREP VII.F (AV-LH) | VARIOUS | VARIOUS | | | | 480. |
| BREP VII.F (AV-LH.4) | VARIOUS | VARIOUS | | | | 1,742. |
| BREP VII.F-NQ (AV-LH.3) | VARIOUS | VARIOUS | | | | 76,337. |
| BREP VII.F-NQ (AV-LH.4) | VARIOUS | VARIOUS | | | | 637,900. |
| BREP VIII.F (AV-LH) | VARIOUS | VARIOUS | | | | 4,509. |
| BREP VIII.F (AV-LH.3) | VARIOUS | VARIOUS | | | | 546. |
| BREP VIII.F (AV-LH.4) | VARIOUS | VARIOUS | | | | 33,945. |
| BREP VIII.F-NQ (AV-LH.2) | VARIOUS | VARIOUS | | | | 761. |
| BREP VIII.F-NQ (AV-LH.3) | VARIOUS | VARIOUS | | | | -815. |
| BREP VIII.F-NQ (AV-LH.4) | VARIOUS | VARIOUS | | | | 5,167. |
| FPA APARTMENT OPPORTUNITY FUND V-A | VARIOUS | VARIOUS | | | | 13,024. |
| MAXIMUM PRIVATE GROWTH FUND | VARIOUS | VARIOUS | | | | 147,369. |
| SCULPTOR REAL ESTATE PARALLEL FUND III A | VARIOUS | VARIOUS | | | | -2,345. |
| BREP VIII.F-NQ (AV-LH) | VARIOUS | VARIOUS | | | | -26. |
| TOTAL TO 4797, PART I, LINE 2 | | | | | | 922,170. |

**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.
Go to www.irs.gov/Form1120 for instructions and the latest information.

OMB No. 1545-0123

2022

| | |
|---|---|
| Name MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Employer identification number 38-1784340 |
|---|---|

Did the corporation dispose of any investment(s) in a qualified opportunity fund during the tax year? Yes No
If "Yes," attach Form 8949 and see its instructions for additional requirements for reporting your gain or loss.

Part I Short-Term Capital Gains and Losses - Assets Held One Year or Less

| 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) Cost (or other basis) | (g) Adjustments to gain or loss from Form(s) 8949, Part I, line 2, column (g) | (h) Gain or (loss) Subtract column (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 | | | | |
| 3 Totals for all transactions reported on Form(s) 8949 with Box C checked | | | | |
| 4 Short-term capital gain from installment sales from Form 6252, line 26 or 37 | | | | 4 |
| 5 Short-term capital gain or (loss) from like-kind exchanges from Form 8824 | | | | 5 |
| 6 Unused capital loss carryover (attach computation) | | | | 6 () |
| 7 Net short-term capital gain or (loss). Combine lines 1a through 6 in column h | | | | 7 |

Part II Long-Term Capital Gains and Losses - Assets Held More Than One Year

| 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) Cost (or other basis) | (g) Adjustments to gain or loss from Form(s) 8949, Part II, line 2, column (g) | (h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g) |
|---|----------------------------------|---------------------------------|--|--|
| 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b | | | | |
| 8b Totals for all transactions reported on 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 | | | | 74,872. |
| 11 Enter gain from Form 4797, line 7 or 9 | | | | 11 922,170. |
| 12 Long-term capital gain from installment sales from Form 6252, line 26 or 37 | | | | 12 |
| 13 Long-term capital gain or (loss) from like-kind exchanges from Form 8824 | | | | 13 |
| 14 Capital gain distributions | | | | 14 |
| 15 Net long-term capital gain or (loss). Combine lines 8a through 14 in column h | | | | 15 997,042. |

Part III Summary of Parts I and II

| | |
|--|--------------------|
| 16 Enter excess of net short-term capital gain (line 7) over net long-term capital loss (line 15) | 16 |
| 17 Net capital gain. Enter excess of net long-term capital gain (line 15) over net short-term capital loss (line 7) | 17 997,042. |
| 18 Add lines 16 and 17. Enter here and on Form 1120, page 1, line 8, or the applicable line on other returns | 18 997,042. |

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

Name(s) shown on return. Name and SSN or taxpayer identification no. not required if shown on page 1
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 will show whether your basis (usually your cost) was reported to the IRS by your broker and may even tell you which box to check.

Part II Long-Term. Transactions involving capital assets you held more than 1 year are generally long-term (see instructions). 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 totals directly on Schedule D, line 8a; you aren't 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 **wasn't** reported to the IRS
- (F)** Long-term transactions not reported to you on Form 1099-B

| 1 | (a) Description of property (Example: 100 sh. XYZ Co.) | (b) Date acquired (Mo., day, yr.) | (c) Date sold or disposed of (Mo., day, yr.) | (d) Proceeds (sales price) | (e) Cost or other basis. See the Note below and see <i>Column (e)</i> in the instructions | Adjustment, if any, to gain or loss. If you enter an amount in column (g), enter a code in column (f). See instructions. | | (h) Gain or (loss). Subtract column (e) from column (d) & combine the result with column (g) | |
|----------|---|---|--|----------------------------------|---|--|-----------------------------|---|---------|
| | | | | | | (f) Code(s) | (g) Amount of adjustment | | |
| | BLACKSTONE RE PARTNERS V.TE.2 | VARIOUS | VARIOUS | | | | | <70,016.> | |
| | BLACKSTONE RE PARTNERS VI.TE.2 | VARIOUS | VARIOUS | | | | | 1,197. | |
| | BLACKSTONE RE PARTNERS VI.TE.2-NQ | VARIOUS | VARIOUS | | | | | 666. | |
| | BLACKSTONE RE PARTNERS X.F | VARIOUS | VARIOUS | | | | | 16. | |
| | BREP VII.F-NQ (AV-LH.3) | VARIOUS | VARIOUS | | | | | 2,009. | |
| | BREP VIII.F (AV-LH) | VARIOUS | VARIOUS | | | | | 399. | |
| | BREP VIII.F (AV-LH.4) | VARIOUS | VARIOUS | | | | | 729. | |
| | BREP VIII.F-NQ (AV-LH.2) | VARIOUS | VARIOUS | | | | | 208. | |
| | SCULPTOR REAL ESTATE PARALLEL FUND III A | VARIOUS | VARIOUS | | | | | 107,048. | |
| | TRIDENT V LP SQUARE MILE PARTNERS III TE | VARIOUS | VARIOUS | | | | | 232. | |
| | BREP VIII.F | | | | | | | 31,578. | |
| | | | | | | | | 806. | |
| 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) | | | | | | | | 74,872. |

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.

Underpayment of Estimated Tax by Corporations

Attach to the corporation's tax return. **FORM 990-T**

2022

Go to www.irs.gov/Form2220 for instructions and the latest information.

| | |
|--|---|
| 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.

| Part I Required Annual Payment | | | |
|--|-----------|-----------|---------|
| 1 Total tax (see instructions) | | 1 | 24,522. |
| 2 a Personal holding company tax (Schedule PH (Form 1120), line 26) included on line 1 | 2a | | |
| b Look-back interest included on line 1 under section 460(b)(2) for completed long-term contracts or section 167(g) for depreciation under the income forecast method | 2b | | |
| c Credit for federal tax paid on fuels (see instructions) | 2c | | |
| d Total. Add lines 2a through 2c | | 2d | |
| 3 Subtract line 2d from line 1. If the result is less than \$500, do not complete or file this form. The corporation does not owe the penalty | | 3 | 24,522. |
| 4 Enter the tax shown on the corporation's 2021 income tax return. See instructions. Caution: If the tax is zero or the tax year was for less than 12 months, skip this line and enter the amount from line 3 on line 5 | | 4 | 11,769. |
| 5 Required annual payment. Enter the smaller of line 3 or line 4. If the corporation is required to skip line 4, enter the amount from line 3 | | 5 | 11,769. |

Part II Reasons for Filing - Check the boxes below that apply. If any boxes are checked, the corporation **must** file Form 2220 even if it does not owe a penalty. See instructions.

6 The corporation is using the adjusted seasonal installment method.

7 The corporation is using the annualized income installment method.

8 The corporation is a "large corporation" figuring its first required installment based on the prior year's tax.

| Part III Figuring the Underpayment | | | | | |
|---|-----------|----------|----------|----------|----------|
| | | (a) | (b) | (c) | (d) |
| 9 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 corporation's tax year | 9 | 05/15/22 | 06/15/22 | 09/15/22 | 12/15/22 |
| 10 Required installments. If the box on line 6 and/or line 7 above is checked, enter the amounts from Sch A, line 38. If the box on line 8 (but not 6 or 7) is checked, see instructions for the amounts to enter. If none of these boxes are checked, enter 25% (0.25) of line 5 above in each column | 10 | 2,942. | 9,319. | 6,131. | 6,130. |
| 11 Estimated tax paid or credited for each period. For column (a) only, enter the amount from line 11 on line 15. See instructions | 11 | | 62,500. | 62,500. | |
| Complete lines 12 through 18 of one column before going to the next column. | | | | | |
| 12 Enter amount, if any, from line 18 of the preceding column | 12 | | | 50,239. | 106,608. |
| 13 Add lines 11 and 12 | 13 | | 62,500. | 112,739. | 106,608. |
| 14 Add amounts on lines 16 and 17 of the preceding column | 14 | | 2,942. | | |
| 15 Subtract line 14 from line 13. If zero or less, enter -0- | 15 | 0. | 59,558. | 112,739. | 106,608. |
| 16 If the amount on line 15 is zero, subtract line 13 from line 14. Otherwise, enter -0- | 16 | | 0. | 0. | |
| 17 Underpayment. If line 15 is less than or equal to line 10, subtract line 15 from line 10. Then go to line 12 of the next column. Otherwise, go to line 18 | 17 | 2,942. | | | |
| 18 Overpayment. If line 10 is less than line 15, subtract line 10 from line 15. Then go to line 12 of the next column | 18 | | 50,239. | 106,608. | |

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.

Part IV Figuring the Penalty

| | (a) | (b) | (c) | (d) |
|--|--------------|-------------------------------|-----|------------|
| 19 Enter the date of payment or the 15th day of the 4th month after the close of the tax year, whichever is earlier. (C corporations with tax years ending June 30 and S corporations: Use 3rd month instead of 4th month. Form 990-PF and Form 990-T filers: Use 5th month instead of 4th month.) See instructions | 19 | | | |
| 20 Number of days from due date of installment on line 9 to the date shown on line 19 | 20 | | | |
| 21 Number of days on line 20 after 4/15/2022 and before 7/1/2022 | 21 | | | |
| 22 Underpayment on line 17 x $\frac{\text{Number of days on line 21} \times 4\% (0.04)}{365}$... | 22 \$ | \$ | \$ | \$ |
| 23 Number of days on line 20 after 6/30/2022 and before 10/1/2022 | 23 | | | |
| 24 Underpayment on line 17 x $\frac{\text{Number of days on line 23} \times 5\% (0.05)}{365}$... | 24 \$ | \$ | \$ | \$ |
| 25 Number of days on line 20 after 9/30/2022 and before 1/1/2023 | 25 | | | |
| 26 Underpayment on line 17 x $\frac{\text{Number of days on line 25} \times 6\% (0.06)}{365}$... | 26 \$ | \$ | \$ | \$ |
| 27 Number of days on line 20 after 12/31/2022 and before 4/1/2023 | 27 | SEE ATTACHED WORKSHEET | | |
| 28 Underpayment on line 17 x $\frac{\text{Number of days on line 27} \times 7\% (0.07)}{365}$... | 28 \$ | \$ | \$ | \$ |
| 29 Number of days on line 20 after 3/31/2023 and before 7/1/2023 | 29 | | | |
| 30 Underpayment on line 17 x $\frac{\text{Number of days on line 29} \times \%}{365}$ | 30 \$ | \$ | \$ | \$ |
| 31 Number of days on line 20 after 6/30/2023 and before 10/1/2023 | 31 | | | |
| 32 Underpayment on line 17 x $\frac{\text{Number of days on line 31} \times \%}{365}$ | 32 \$ | \$ | \$ | \$ |
| 33 Number of days on line 20 after 9/30/2023 and before 1/1/2024 | 33 | | | |
| 34 Underpayment on line 17 x $\frac{\text{Number of days on line 33} \times \%}{365}$ | 34 \$ | \$ | \$ | \$ |
| 35 Number of days on line 20 after 12/31/2023 and before 3/16/2024 | 35 | | | |
| 36 Underpayment on line 17 x $\frac{\text{Number of days on line 35} \times \%}{366}$ | 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 total here and on Form 1120, line 34; or the comparable line for other income tax returns | 38 \$ | | | 10. |

* Use the penalty interest rate for each calendar quarter, which the IRS will determine during the first month in the preceding quarter. These rates are published quarterly in an IRS News Release and in a revenue ruling in the Internal Revenue Bulletin. To obtain this information on the Internet, access the IRS website at www.irs.gov. You can also call 1-800-829-4933 to get interest rate information.

FORM 990-T
UNDERPAYMENT OF ESTIMATED TAX WORKSHEET

| Name(s) MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | | | | | Identifying Number 38-1784340 |
|--|---------------|--------------------------------|-----------------------------------|------------------------------|---|
| (A) *Date | (B) Amount | (C) Adjusted Balance Due | (D) Number Days Balance Due | (E) Daily Penalty Rate | (F) Penalty |
| | | -0- | | | |
| 05/15/22 | 2,942. | 2,942. | 31 | .000109589 | 10. |
| 06/15/22 | 9,319. | 12,261. | | | |
| 06/15/22 | -62,500. | -50,239. | | | |
| 06/30/22 | 0. | -50,239. | 77 | .000136986 | |
| 09/15/22 | 6,131. | -44,108. | | | |
| 09/15/22 | -62,500. | -106,608. | | | |
| 09/30/22 | 0. | -106,608. | 76 | .000164384 | |
| 12/15/22 | 6,130. | -100,478. | | | |
| 12/31/22 | 0. | -100,478. | 135 | .000191781 | |
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Penalty Due (Sum of Column F). 10.

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

Sales of Business Property
(Also Involuntary Conversions and Recapture Amounts
Under Sections 179 and 280F(b)(2))

Attach to your tax return.

Go to www.irs.gov/Form4797 for instructions and the latest information.

Name(s) shown on return

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

Identifying number

38-1784340

- 1a** Enter the gross proceeds from sales or exchanges reported to you for 2022 on Form(s) 1099-B or 1099-S (or substitute statement) that you are including on line 2, 10, or 20
- b** Enter the total amount of gain that you are including on lines 2, 10, and 24 due to the partial dispositions of MACRS assets
- c** Enter the total amount of loss that you are including on lines 2 and 10 due to the partial dispositions of MACRS assets

1a

1b

1c

Part I Sales or Exchanges of Property Used in a Trade or Business and Involuntary Conversions From Other Than Casualty or Theft-Most Property Held More Than 1 Year (see instructions)

| 2 | (a) Description of property | (b) Date acquired (mo., day, yr.) | (c) Date sold (mo., day, yr.) | (d) Gross sales price | (e) Depreciation allowed or allowable since acquisition | (f) Cost or other basis, plus improvements and expense of sale | (g) Gain or (loss) Subtract (f) from the sum of (d) and (e) |
|----------|------------------------------------|--|--------------------------------------|------------------------------|--|---|--|
| | SEE STATEMENT 28 | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

- 3** Gain, if any, from Form 4684, line 39
- 4** Section 1231 gain from installment sales from Form 6252, line 26 or 37
- 5** Section 1231 gain or (loss) from like-kind exchanges from Form 8824
- 6** Gain, if any, from line 32, from other than casualty or theft
- 7** Combine lines 2 through 6. Enter the gain or (loss) here and on the appropriate line as follows

3

4

5

6

7

922,170.

Partnerships and S corporations. Report the gain or (loss) following the instructions for Form 1065, Schedule K, line 10, or Form 1120-S, Schedule K, line 9. Skip lines 8, 9, 11, and 12 below.

Individuals, partners, S corporation shareholders, and all others. If line 7 is zero or a loss, enter the amount from line 7 on line 11 below and skip lines 8 and 9. If line 7 is a gain and you didn't have any prior year section 1231 losses, or they were recaptured in an earlier year, enter the gain from line 7 as a long-term capital gain on the Schedule D filed with your return and skip lines 8, 9, 11, and 12 below.

- 8** Nonrecaptured net section 1231 losses from prior years. See instructions
- 9** Subtract line 8 from line 7. If zero or less, enter -0-. If line 9 is zero, enter the gain from line 7 on line 12 below. If line 9 is more than zero, enter the amount from line 8 on line 12 below and enter the gain from line 9 as a long-term capital gain on the Schedule D filed with your return. See instructions

8

9

922,170.

Part II Ordinary Gains and Losses (see instructions)

10 Ordinary gains and losses not included on lines 11 through 16 (include property held 1 year or less):

- 11** Loss, if any, from line 7
- 12** Gain, if any, from line 7 or amount from line 8, if applicable
- 13** Gain, if any, from line 31
- 14** Net gain or (loss) from Form 4684, lines 31 and 38a
- 15** Ordinary gain from installment sales from Form 6252, line 25 or 36
- 16** Ordinary gain or (loss) from like-kind exchanges from Form 8824
- 17** Combine lines 10 through 16

11

12

13

14

15

16

17

()

18 For all except individual returns, enter the amount from line 17 on the appropriate line of your return and skip lines a and b below. For individual returns, complete lines a and b below.

- a** If the loss on line 11 includes a loss from Form 4684, line 35, column (b)(ii), enter that part of the loss here. Enter the loss from income-producing property on Schedule A (Form 1040), line 16. (Do not include any loss on property used as an employee.) Identify as from "Form 4797, line 18a." See instructions
- b** Redetermine the gain or (loss) on line 17 excluding the loss, if any, on line 18a. Enter here and on Schedule 1 (Form 1040), Part I, line 4

18a

18b

LHA For Paperwork Reduction Act Notice, see separate instructions.

Part III Gain From Disposition of Property Under Sections 1245, 1250, 1252, 1254, and 1255 (see instructions)

| 19 (a) Description of section 1245, 1250, 1252, 1254, or 1255 property: | | (b) Date acquired (mo., day, yr.) | (c) Date sold (mo., day, yr.) |
|---|--|--------------------------------------|----------------------------------|
| A | | | |
| B | | | |
| C | | | |
| D | | | |
| These columns relate to the properties on lines 19A through 19D. | | | |
| | | Property A | Property B |
| | | Property C | Property D |
| 20 | Gross sales price (Note: See line 1a 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: | | |
| a | 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. | | |
| a | Additional depreciation after 1975. See instructions | 26a | |
| b | Applicable percentage multiplied by the smaller of line 24 or line 26a. See instructions | 26b | |
| c | Subtract line 26a from line 24. If residential rental property or line 24 isn't more than line 26a, skip lines 26d and 26e | 26c | |
| d | Additional depreciation after 1969 and before 1976 | 26d | |
| e | Enter the smaller of line 26c or 26d | 26e | |
| f | Section 291 amount (corporations only) | 26f | |
| g | Add lines 26b, 26e, and 26f | 26g | |
| 27 | If section 1252 property: Skip this section if you didn't dispose of farmland or if this form is being completed for a partnership. | | |
| a | Soil, water, and land clearing expenses | 27a | |
| b | Line 27a multiplied by applicable percentage | 27b | |
| c | Enter the smaller of line 24 or 27b | 27c | |
| 28 | If section 1254 property: | | |
| a | Intangible drilling and development costs, expenditures for development of mines and other natural deposits, mining exploration costs, and depletion. See instructions | 28a | |
| b | Enter the smaller of line 24 or 28a | 28b | |
| 29 | If section 1255 property: | | |
| a | 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 | |

Summary of Part III Gains. Complete property columns A through D through line 29b before going to line 30.

| | | | |
|----|---|----|--|
| 30 | Total gains for all properties. Add property columns A through D, line 24 | 30 | |
| 31 | Add property columns A through D, lines 25b, 26g, 27c, 28b, and 29b. Enter here and on line 13 | 31 | |
| 32 | Subtract line 31 from line 30. Enter the portion from casualty or theft on Form 4684, line 33. Enter the portion from other than casualty or theft on Form 4797, line 6 | 32 | |

Part IV Recapture Amounts Under Sections 179 and 280F(b)(2) When Business Use Drops to 50% or Less (see instructions)

| | | (a) Section 179 | (b) Section 280F(b)(2) |
|----|---|-----------------|------------------------|
| 33 | Section 179 expense deduction or depreciation allowable in prior years | 33 | |
| 34 | Recomputed depreciation. See instructions | 34 | |
| 35 | Recapture amount. Subtract line 34 from line 33. See the instructions for where to report | 35 | |

FORM 4797

PROPERTY HELD MORE THAN ONE YEAR

STATEMENT 28

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | SALES PRICE | DEPR. | COST OR BASIS | GAIN OR LOSS |
|--|------------------|--------------|----------------|-------|------------------|-----------------|
| BLACKSTONE RE PARTNERS V.TE.2 | VARIOUS | VARIOUS | | | | 3,512. |
| BLACKSTONE RE PARTNERS VI.TE.2 | VARIOUS | VARIOUS | | | | 64. |
| BREP VII.F (AV-LH) | VARIOUS | VARIOUS | | | | 480. |
| BREP VII.F (AV-LH.4) | VARIOUS | VARIOUS | | | | 1,742. |
| BREP VII.F-NQ (AV-LH.3) | VARIOUS | VARIOUS | | | | 76,337. |
| BREP VII.F-NQ (AV-LH.4) | VARIOUS | VARIOUS | | | | 637,900. |
| BREP VIII.F (AV-LH) | VARIOUS | VARIOUS | | | | 4,509. |
| BREP VIII.F (AV-LH.3) | VARIOUS | VARIOUS | | | | 546. |
| BREP VIII.F (AV-LH.4) | VARIOUS | VARIOUS | | | | 33,945. |
| BREP VIII.F-NQ (AV-LH.2) | VARIOUS | VARIOUS | | | | 761. |
| BREP VIII.F-NQ (AV-LH.3) | VARIOUS | VARIOUS | | | | -815. |
| BREP VIII.F-NQ (AV-LH.4) | VARIOUS | VARIOUS | | | | 5,167. |
| FPA APARTMENT OPPORTUNITY FUND V-A | VARIOUS | VARIOUS | | | | 13,024. |
| MAXIMUM PRIVATE GROWTH FUND | VARIOUS | VARIOUS | | | | 147,369. |
| SCULPTOR REAL ESTATE PARALLEL FUND III A | VARIOUS | VARIOUS | | | | -2,345. |
| BREP VIII.F-NQ (AV-LH) | VARIOUS | VARIOUS | | | | -26. |
| TOTAL TO 4797, PART I, LINE 2 | | | | | | 922,170. |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) EAGLE POINT CREDIT PARTNERS SUB III LTD C/O CITCO TRUSTEES (CAYMAN) LIMITED | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) 89 NEXUS WAY, 2ND FLOOR, CAMANA BAY GRAND CAYMAN, CAYMAN ISLANDS KY1-1205 | Reference ID number (see instructions) Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 29**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) MARATHON CLO VI, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) ONE NEXUS WAY GEORGE TOWN, CAYMAN ISLANDS KY1-1108 | Reference ID number (see instructions) MARATHONCLOVI Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning FEB 1 2021 , and ending JAN 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **2**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 30**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) EVERY POINT V INVESTOR, LTD | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) 200 CLARENDON STREET, FLOOR 41 BOSTON, MA 02116 | Reference ID number (see instructions) Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 31**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) MADISON PARK FUNDING XL, LTD FKA ATRIUM IX | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) WINDWARD 3, REGATTA OFFICE PARK, PO BOX 1350 GRAND CAYMAN, CAYMAN ISLANDS KY1-1108 | Reference ID number (see instructions) ATRIUMIX Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **5**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 32**

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 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 includable under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE GLOBAL MARKET STRATEGIES CLO 2014-5, LTD | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) CAYMAN CORPORATE CENTER GEORGE TOWN, CAYMAN ISLANDS KY1-9008 | Reference ID number (see instructions) Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **4**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 33**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| <p>Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections.</p> | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) MARATHON CLO VII, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) ONE NEXUS WAY GEORGE TOWN, CAYMAN ISLANDS KY1-9005 | Reference ID number (see instructions) MARATHONCLOVII Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning FEB 1 2021 , and ending JAN 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **2**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 34**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) MADISON PARK FUNDING XXI, LTD. | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) WINDWARD 3, REGATTA OFFICE PARK, PO BOX 1350 GRAND CAYMAN, CAYMAN ISLANDS KY1-1108 | Reference ID number (see instructions) MADISONPARKFUNDXXI Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **4**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 35**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ZAIS CLO 5, LIMITED | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) ZAISCL05 Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **2.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 36**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) MARATHON CLO X LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS KY1-9008 | Reference ID number (see instructions) MARATHONCLOX |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 37**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) STEELE CREEK CLO 2015-1, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) PO BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) STEELECREEK20151 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **3**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 38**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) EAGLE POINT CREDIT NON-US LP | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) 600 STEAMBOAT ROAD, SUITE 202 GREENWICH, CT 06830 | Reference ID number (see instructions) Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 39**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ALM VIII, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS KY1-9005 | Reference ID number (see instructions) ALMVIII |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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: **PREFERRED SHARES**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: _____
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 40**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) MADISON PARK FUNDING XLIV, LTD FKA ATRIUM XV | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) WINDWARD 3, REGATTA OFFICE PARK, PO BOX 1350 GRAND CAYMAN, CAYMAN ISLANDS KY1-1108 | Reference ID number (see instructions) ATRIUMXV Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **4**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 41**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CIFC FUNDING 2018-V LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) WINDWARD 3, REGATTA OFFICE PARK, PO BOX 1350 GRAND CAYMAN, CAYMAN ISLANDS KY1-1108 | Reference ID number (see instructions) CIFCFUNDING2018V |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: OTHER
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: 1.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 42**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) DRYDEN 66 EURO CLO 2018 BV | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 3RD FL, KILMORE HOUSE SPENCER DOCK, IRELAND | Reference ID number (see instructions) DRYDEN66EUROCLO2018 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JUN 1 2021 , and ending MAY 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 43**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) HARBOURVIEW CLO VII-R, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) HARBOURVIEWCLOVIIR Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning AUG 1 2021 , and ending JUL 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 44**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) MADISON PARK FUNDING XXII, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) WINDWARD 3, REGATTA OFFICE PARK, PO BOX 1350 GRAND CAYMAN, CAYMAN ISLANDS KY1-1108 | Reference ID number (see instructions) MADISONPARKFUNDINGXXII Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: OTHER
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: 2.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 45**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) MARATHON CLO XI LTD C/O WALKERS FIDUCIARY LIMITED | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS KY1-9008 | Reference ID number (see instructions) MARATHONCLOXI Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 46**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) MARATHON CLO XII LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) ONE NEXUS WAY GEORGE TOWN, CAYMAN ISLANDS KY1-9005 | Reference ID number (see instructions) MARATHONCLOXII Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **2.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 47**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
OCTAGON INVESTMENT PARTNERS 38, LTD

Employer identification number (if any)

Address (Enter number, street, city or town, and country.)
**P.O. BOX 1093, CRICKET SQUARE
GRAND CAYMAN, CAYMAN ISLANDS KY1-1102**

Reference ID number (see instructions)
OCTAGONINVESTMENTPARTNERS38

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **NOV 1 2021**, and ending **OCT 31, 2022**.

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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: **1.**
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 48**

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 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 includable under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) OFSI BSL IX LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) PO BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) OFSIBSLIX Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 49**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

Name of shareholder: **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.** | Identifying number (see instructions): **38-1784340**

Number, street, and room or suite no. If a P.O. box, see instructions: **TWO TOWNE SQUARE, 900** | Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country: **SOUTHFIELD, MI 48076**

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
 Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): **ZAIS CLO 8, LIMITED** | Employer identification number (if any)

Address (Enter number, street, city or town, and country.): **PO BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102** | Reference ID number (see instructions): **ZAISCL08**

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **DEC 1 2021**, and ending **NOV 30, 2022**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 50**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ZAIS CLO 9, LIMITED | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) ZAISCLO9 Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 51**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| | Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | |
|---|--|------|-------|------|-----|------|
| | (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 | | | | | | |
| | Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | |
| 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 | | | | | | |
| | Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ZAIS INCOME NOTE 7 LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) PO BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) ZAISINCOMENOTE7 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 52**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CIFC FUNDING 2019-III, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) WINDWARD 3, REGATTA OFFICE PARK, PO BOX 1350 GRAND CAYMAN, CAYMAN ISLANDS KY1-1108 | Reference ID number (see instructions) CIFCFUNDING2019III Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 53**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) MARATHON CLO VIII INCOME NOTE ISSUER LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) ONE NEXUS WAY, CAMANA BAY GEORGE TOWN, CAYMAN ISLANDS KY1-9005 | Reference ID number (see instructions) MARATHONCLOVIII Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 54**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

Name of shareholder: **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.** | Identifying number (see instructions): **38-1784340**

Number, street, and room or suite no. If a P.O. box, see instructions: **TWO TOWNE SQUARE, 900** | Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country: **SOUTHFIELD, MI 48076**

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
 Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): **ARES XXXIV CLO LTD.** | Employer identification number (if any)

Address (Enter number, street, city or town, and country.): **WINDWARD 3, REGATTA OFFICE PARK, PO BOX 1350 GRAND CAYMAN, CAYMAN ISLANDS KY1-1108** | Reference ID number (see instructions): **ARESXXXIVCLO**

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **DEC 1 2021**, and ending **NOV 30, 2022**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **2**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 55**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ARES XXXIV CLO TAX SUBSIDIARY LTD. | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) WINDWARD 3, REGATTA OFFICE PARK, PO BOX 1350 GRAND CAYMAN, CAYMAN ISLANDS KY1-1108 | Reference ID number (see instructions) ARESXXXIVCLOTAX Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **9**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 56**

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 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 includable under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

Name of shareholder: **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.** | Identifying number (see instructions): **38-1784340**

Number, street, and room or suite no. If a P.O. box, see instructions: **TWO TOWNE SQUARE, 900** | Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country: **SOUTHFIELD, MI 48076**

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
 Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): **BAIN CAPITAL CREDIT MASTER 110 DAC** | Employer identification number (if any)

Address (Enter number, street, city or town, and country.): **32 MOLESWORTH STREET DUBLIN 2, IRELAND D02 Y512** | Reference ID number (see instructions): **BAINCAPCREDITMASTER110**
 Tax year of foreign corporation, PFIC, or QEF: Calendar year **2022** 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 57**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) BLUEMOUNTAIN CLO 2018-1 | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) PO BOX 1093, CRICKET SQUARE GEORGE TOWN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) BLUEMOUNTAINCLO2018 |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **2**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 58**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
BLUE MOUNTAIN CLO XXII LTD.

Employer identification number (if any)

Address (Enter number, street, city or town, and country.)
**PO BOX 1093, CRICKET SQUARE
GEORGE TOWN, CAYMAN ISLANDS KY1-1102**

Reference ID number (see instructions)
BLUEMOUNTAINCLOXXII

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **DEC 1 2021**, and ending **NOV 30, 2021**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **3**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 59**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) BLUE MOUNTAIN CLO XXIV LTD. | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) PO BOX 1093, CRICKET SQUARE GEORGE TOWN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) BLUEMOUNTAINCLOXXIV Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **4**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 60**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) BLUE MOUNTAIN CLO XXV LTD. | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) PO BOX 1093, BOUNDARY HALL, CRICKET SQUARE GEORGE TOWN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) BLUEMOUNTAINCLOXXV Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **3**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 61**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE GLOBAL MARKET STRATEGIES CLO 2014-5 - BLOCKER 2, LTD | Employer identification number (if any) **_***** |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS KY1-9005 | Reference ID number (see instructions) |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: _____
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 62**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder: MAX M. & MARJORIE S. FISHER FOUNDATION, INC.

Identifying number (see instructions): 38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions: TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year 2022 or other tax year beginning and ending

City or town, state, and ZIP code or country: SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual [] Corporation [X] Partnership [] S Corporation [] Nongrantor Trust [] Estate []

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions []

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions []

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): CARLYLE US CLO 2017-4 - BLOCKER, LTD.

Employer identification number (if any): **_*****

Address (Enter number, street, city or town, and country.): 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS KY1-9005

Reference ID number (see instructions): CARLYLEUSCLO20174

Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: COMMON
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable): (a) [X] \$0-50,000 (b) [] \$50,001-100,000 (c) [] \$100,001-150,000 (d) [] \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply): (a) [] Section 1291 \$ (b) [] Section 1293 (Qualified Electing Fund) \$ (c) [] Section 1296 (Mark to Market) \$ SEE STATEMENT 63

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
C [] Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D [] 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 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 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.
G [] Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE US CLO 2017-5, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS KY1-9005 | Reference ID number (see instructions) CARLYLEUSCLO20175 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 64**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) EAGLE POINT CREDIT GP I-A LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 20 HORSENECK LANE GREENWICH, CT 06830 | Reference ID number (see instructions) EAGLEPOINTCREDITGP I A |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 65**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) EATON VANCE 2015-1, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS KY1-9005 | Reference ID number (see instructions) EATONVANCE20151 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **3**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 66**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) GOLDMAN SACHS US \$ TREASURY LIQUID RESERVES | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) MATSACK TRUST LIMITED DUBLIN 2, IRELAND | Reference ID number (see instructions) GOLDMANSACHSUSTREASURY Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 67**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

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

Employer identification number (if any)

Address (Enter number, street, city or town, and country.)
**ONE NEXUS WAY
 GEORGETOWN, CAYMAN ISLANDS KY1-9005**

Reference ID number (see instructions)
MARATHONCLOIX

Tax year of foreign corporation, PFIC, or QEF: Calendar year **2022** 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **3.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 68**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) BATTALION CLO IX INCOME NOTE ISSUER LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) PO BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) BATTALIAN Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 69**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

Name of shareholder: **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.** | Identifying number (see instructions): **38-1784340**

Number, street, and room or suite no. If a P.O. box, see instructions: **TWO TOWNE SQUARE, 900** | Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country: **SOUTHFIELD, MI 48076**

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
 Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): **ANCHORAGE CREDIT FUNDING 13, LTD** | Employer identification number (if any)

Address (Enter number, street, city or town, and country.): **ONE NEXUS WAY GEORGE TOWN, CAYMAN ISLANDS KY1-9005** | Reference ID number (see instructions): **ANCHORAGE13**

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **JUL 7 2022**, and ending **NOV 30, 2022**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 70**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) BARINGS CLO LTD, 2018-IV | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) PO BOX 1093, CRICKET SQUARE GEORGE TOWN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) BARINGS2018IV Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: OTHER
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: 4.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 71**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) BLUEMOUNTAIN CLO XXIII LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) PO BOX 1093, CRICKET SQUARE GEORGE TOWN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) BLUEMOUNTAINCLOXXIII Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **3**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 72**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE US CLO 2017-4 INCOME NOTE, LTD. | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS KY1-9005 | Reference ID number (see instructions) CARLYLE20174INCOMENOTE Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 73**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE US CLO 2018-1, LTD. | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS KY1-9005 | Reference ID number (see instructions) Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 74**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CATSKILL PARK CLO, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) ONE NEXUS WAY GEORGE TOWN, CAYMAN ISLANDS KY1-9005 | Reference ID number (see instructions) CATSTILLPARK Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **2**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 75**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) EAGLE POINT CREDIT PARTNERS SUB IV LTD | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) 600 STEAMBOAT ROAD, SUITE 202 GREENWICH, CT 06830 | Reference ID number (see instructions) Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning MAR 1 2022 , and ending DEC 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 76**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

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

EAGLE POINT CREDIT PARTNERS SUB LLC - EPCP LP

Employer identification number (if any)
****_*******

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

**600 STEAMBOAT ROAD, SUITE 202
GREENWICH, CT 06830**

Reference ID number (see instructions)

Tax year of foreign corporation, PFIC, or QEF: Calendar year **2022** 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: **COMMON**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: _____
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 77**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) NAPIER PARK REGATTA VII, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) NOT AVAILABLE NOT AVAILABLE, CAYMAN ISLANDS NA | Reference ID number (see instructions) NAPIERPARK Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **3.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 78**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) NEUBERGER BERMAN LOAN ADVISERS CLO 34 LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) NEUBERGERBERMAN |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: **1.**
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 79**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) NORTHWOODS CAPITAL XI-B, LIMITED | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) PO BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) NORTHWOODSCAPXIB Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **2**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 80**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) OCP EURO CLO 2019-3 DAC | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 3RD FL, KILMORE HOUSE SPENCER DOCK, IRELAND | Reference ID number (see instructions) OCPEURO20193 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 81**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) OCTAGON INVESTMENT PARTNERS 29, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) OCTAGONINVEST29 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **4**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 82**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) OCTAGON INVESTMENT PARTNERS 32, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) OCTAGONINVEST32 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2022 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 83**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) OCTAGON INVESTMENT PARTNERS 37, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) OCTAGONINVEST37 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 84**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) OCTAGON INVESTMENT PARTNERS 40, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) OCTAGONINVEST40 |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning MAR 1 2021 , and ending FEB 28, 2022 . |

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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: **1.**
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 85**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
PRUDENTIAL DRYDEN 64 CLO, LTD

Employer identification number (if any)

Address (Enter number, street, city or town, and country.)
**P.O. BOX 1093, CRICKET SQUARE
GRAND CAYMAN, CAYMAN ISLANDS KY1-1102**

Reference ID number (see instructions)
PRUDENTIAL64

Tax year of foreign corporation, PFIC, or QEF: Calendar year **2022** 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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: **5.**
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 86**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| | Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | |
|---|--|------|-------|------|-----|------|
| | (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 | | | | | | |
| | Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | |
| 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 | | | | | | |
| | Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) PRUDENTIAL DRYDEN 75 CLO, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) PRUDENTIAL75 |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **5.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 87**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) PRUDENTIAL DRYDEN 78 CLO, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) PRUDENTIAL78 Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 88**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) PRUDENTIAL DRYDEN 88 EURO CLO 2020 DAC | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 3RD FL, KILMORE HOUSE SPENCER DOCK, IRELAND | Reference ID number (see instructions) PRUDENTIAL88 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JUN 11 2022 , and ending DEC 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 89**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Employer identification number (if any)

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
THL CREDIT WIND RIVER 2014-1 CLO LTD

Reference ID number (see instructions)
THLCREDITWINDRIVER2014I

Address (Enter number, street, city or town, and country.)
**190 ELGIN AVENUE
GRAND CAYMAN, CAYMAN ISLANDS KY1-9005**

Tax year of foreign corporation, PFIC, or QEF: Calendar year **2022** 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **4.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 90**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) VENTURE 41 CLO, LIMITED | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) PO BOX 1093, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) VENTURE41 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning FEB 5 2022 , and ending DEC 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 91**

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 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 includable under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

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

Employer identification number (if any)
****_*******

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

C/O EPISO 5 LUXEMBOURG HOLDING S.A.R.L.

Reference ID number (see instructions)

Tax year of foreign corporation, PFIC, or QEF: Calendar year **2022** 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: **COMMON**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: **10,404.**
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 92**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ANCHORAGE CREDIT FUNDING 12-C, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) ONE NEXUS WAY CAMANA BAY, CAYMAN ISLANDS | Reference ID number (see instructions) ANCHORAGE12C Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 93**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

Name of shareholder: **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.** | Identifying number (see instructions): **38-1784340**

Number, street, and room or suite no. If a P.O. box, see instructions: **TWO TOWNE SQUARE, 900** | Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country: **SOUTHFIELD, MI 48076**

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
 Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): **ARES INCOME NOTE LI LTD** | Employer identification number (if any)

Address (Enter number, street, city or town, and country.): **WINDWARD 3, REGATTA OFFICE PARK, PO BOX 1350 GRAND CAYMAN, CAYMAN ISLANDS KY1-1108** | Reference ID number (see instructions): **ARESINCOMENOTELI**

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **NOV 1 2021**, and ending **OCT 31, 2022**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 94**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ARES LVIII CLO LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) PO BOX 1093, BOUNDARY HALL, CRICKET SQUARE GRAND CAYMAN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) ARESLVIII Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning MAR 1 2021 , and ending FEB 28, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **2**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 95**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) BARINGS CLO LTD, 2019-I, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) BARINGS2019I Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 96**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) BARINGS INCOME NOTE LTD. 2020-I | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) BARINGSINCOMENOTE2020I Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 97**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
BATTALION CLO 18 INCOME NOTE LTD

Employer identification number (if any)

Address (Enter number, street, city or town, and country.)
**P.O. BOX 1093, CRICKET SQUARE
GEORGE TOWN, CAYMAN ISLANDS KY1-1102**

Reference ID number (see instructions)
BATTALION18INCOMENOTE

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **DEC 1 2021**, and ending **NOV 30, 2022**.

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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: _____
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 98**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) BATTALION CLO IX LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, CRICKET SQUARE GEORGE TOWN, CAYMAN ISLANDS KY1-1102 | Reference ID number (see instructions) BATTALIONIX Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 99**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
BATTALION CLO XIX INCOME NOTE LTD

Employer identification number (if any)

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

Reference ID number (see instructions)
BATTALIONXIXINCOMENOTE

**P.O. BOX 1093, QUEENSGATE HOUSE
 GEORGE TOWN, CAYMAN ISLANDS KY1-1102**

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **DEC 1 2021**, and ending **NOV 30, 2022**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 100**

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 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 includable under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE GLOBAL MARKET STRATEGIES CLO 2014-5 LTD - BLOCKER | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) ONE NEXUS WAY CAMANA BAY, CAYMAN ISLANDS | Reference ID number (see instructions) CARLYLE20145BLOCKER Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 101**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE GMS 2017-4 INCOME NOTE, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) CARLYLEGMS20174INCOMENOTE Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 102**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)

38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

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

**CARLYLE GMS
2017-4 INCOME NOTE - BLOCKER**

Employer identification number (if any)

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

**190 ELGIN AVENUE
GEORGE TOWN, CAYMAN ISLANDS**

Reference ID number (see instructions)

CARLYLEGMS20174BLOCKER

Tax year of foreign corporation, PFIC, or QEF: Calendar year **2022** 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 103**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| | Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | |
|---|--|------|-------|------|-----|------|
| | (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 | | | | | | |
| | Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | |
| 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 | | | | | | |
| | Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

Name of shareholder: **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.** | Identifying number (see instructions): **38-1784340**

Number, street, and room or suite no. If a P.O. box, see instructions: **TWO TOWNE SQUARE, 900** | Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country: **SOUTHFIELD, MI 48076**

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
 Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): **CARLYLE GMS 2017-5, LTD** | Employer identification number (if any)

Address (Enter number, street, city or town, and country.): **190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS** | Reference ID number (see instructions): **CARLYLEGMS20175**

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **NOV 1 2021**, and ending **OCT 31, 2022**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **5**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 104**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

Name of shareholder: **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.** | Identifying number (see instructions): **38-1784340**

Number, street, and room or suite no. If a P.O. box, see instructions: **TWO TOWNE SQUARE, 900** | Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country: **SOUTHFIELD, MI 48076**

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
 Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): **CARLYLE GMS 2018-1 - BLOCKER** | Employer identification number (if any)

Address (Enter number, street, city or town, and country.): **190 ELGIN AVENUE GEORGE TOWN, CAYMAN ISLANDS** | Reference ID number (see instructions): **CARLYLEGMS20181BLOCKER**

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **NOV 1 2021**, and ending **OCT 31, 2022**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 105**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE GMS 2018-1 - BLOCKER 2 | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GEORGE TOWN, CAYMAN ISLANDS | Reference ID number (see instructions) CARLYLEGMS20181BLOCKER2 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 106**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder: MAX M. & MARJORIE S. FISHER FOUNDATION, INC.

Identifying number (see instructions): 38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions: TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year 2022 or other tax year beginning and ending

City or town, state, and ZIP code or country: SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual [] Corporation [X] Partnership [] S Corporation [] Nongrantor Trust [] Estate []

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions []

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): CARLYLE GMS 2018-1, LTD

Employer identification number (if any): **-*****

Address (Enter number, street, city or town, and country.): 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS

Reference ID number (see instructions): CARLYLEGMS20181LTD

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021, and ending OCT 31, 2022.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: OTHER
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year: 1.
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable): (a) [X] \$0-50,000 (b) [] \$50,001-100,000 (c) [] \$100,001-150,000 (d) [] \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply): (a) [] Section 1291 \$ (b) [] Section 1293 (Qualified Electing Fund) \$ (c) [] Section 1296 (Mark to Market) \$ SEE STATEMENT 107

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
C [] Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D [] 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 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 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.
G [] Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE GMS 2018-4 - BLOCKER | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GEORGE TOWN, CAYMAN ISLANDS | Reference ID number (see instructions) CARLYLEGMS20184BLOCKER Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 108**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE GMS 2018-4, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) CARLYLEGMS20184LTD Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **3**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 109**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder: MAX M. & MARJORIE S. FISHER FOUNDATION, INC.

Identifying number (see instructions): 38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions: TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year 2022 or other tax year beginning and ending

City or town, state, and ZIP code or country: SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual [] Corporation [X] Partnership [] S Corporation [] Nongrantor Trust [] Estate []

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions []

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions []

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): CARLYLE GMS 2021-1, LTD

Employer identification number (if any)

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

190 ELGIN AVENUE GEORGE TOWN, CAYMAN ISLANDS

Reference ID number (see instructions): CARLYLEGMS20211LTD

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021, and ending OCT 31, 2022.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: OTHER
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):

SEE STATEMENT 110

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 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.
C Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D 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 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 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.
G Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE GMS 2021-4, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GEORGE TOWN, CAYMAN ISLANDS | Reference ID number (see instructions) CARLYLEGMS20214LTD Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 111**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE GMS 2021-7, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GEORGE TOWN, CAYMAN ISLANDS | Reference ID number (see instructions) CARLYLEGMS20217LTD Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 112**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE US 2018-4 BLOCKER 2 | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) CARLYLEUS20184BLOCKER2 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 113**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| | Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | |
|---|--|------|-------|------|-----|------|
| | (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 | | | | | | |
| | Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | |
| 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 | | | | | | |
| | Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
CARLYLE US 2021-1 BLOCKER

Employer identification number (if any)
****_*******

Address (Enter number, street, city or town, and country.)
**190 ELGIN AVENUE
GRAND CAYMAN, CAYMAN ISLANDS**

Reference ID number (see instructions)
CARLYLEUS20211BLOCKER

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **JAN 13 2022**, and ending **OCT 31, 2022**.

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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: _____
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 114**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
CARLYLE US 2021-4 BLOCKER

Employer identification number (if any)
****_*******

Address (Enter number, street, city or town, and country.)
**190 ELGIN AVENUE
GRAND CAYMAN, CAYMAN ISLANDS**

Reference ID number (see instructions)
CARLYLEUS20214BLOCKER

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **JAN 13 2022**, and ending **NOV 30, 2022**.

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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: _____
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 115**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE US 2021-7 BLOCKER | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) CARLYLEUS20217BLOCKER Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 4 2022 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 116**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
CARLYLE US CLO 2017-4 - BLOCKER 2, LTD.

Employer identification number (if any)
****_*******

Address (Enter number, street, city or town, and country.)
**190 ELGIN AVENUE
GRAND CAYMAN, CAYMAN ISLANDS**

Reference ID number (see instructions)
CARLYLEUSCLO20174BLOCKER2

Tax year of foreign corporation, PFIC, or QEF: Calendar year **2022** 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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: _____
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 117**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CARLYLE US CLO 2017-5 - BLOCKER 2, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) CARLYLEUSCLO20175BLOCKER2 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 118**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CIFC FUNDING 2019-IV INVESTOR, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 71 FORT ST, P.O. BOX 500 GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) CIFCFUNDING2019IVINVESTOR Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 119**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CIFC FUNDING 2020-I INVESTOR, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 71 FORT ST, P.O. BOX 500 GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) CIFCFUNDING2020IINVESTOR Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 120**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CIFC FUNDING 2020-IV INVESTOR, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 71 FORT ST, P.O. BOX 500 GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) CIFCFUNDING2020IVINVESTOR Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: OTHER
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 121**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

Name of shareholder: **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.** | Identifying number (see instructions): **38-1784340**

Number, street, and room or suite no. If a P.O. box, see instructions: **TWO TOWNE SQUARE, 900** | Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country: **SOUTHFIELD, MI 48076**

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
 Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): **CIFC FUNDING 2021-III INVESTOR, LTD** | Employer identification number (if any)

Address (Enter number, street, city or town, and country.): **71 FORT ST, P.O. BOX 500 GRAND CAYMAN, CAYMAN ISLANDS** | Reference ID number (see instructions): **CIFCFUNDING2021IIIIINVESTOR**

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **NOV 1 2021**, and ending **OCT 31, 2022**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 122**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
CIFC FUNDING 2021-VI INVESTOR, LTD

Employer identification number (if any)

Address (Enter number, street, city or town, and country.)
**71 FORT ST, P.O. BOX 500
GRAND CAYMAN, CAYMAN ISLANDS**

Reference ID number (see instructions)
CIFCFUNDING2021VIINVESTOR

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **NOV 4 2021**, and ending **OCT 31, 2022**.

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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: _____
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 123**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CSAM MADISON PARK FUNDING XXXIV, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) WINDWARD 3, REGATTA OFFICE PARK, PO BOX 1350 GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) CSAMMADISONPARKFUNDINGXXXIV Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **3**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 124**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CUTWATER 2014-I ETB SUBSIDIARY, LTD C/O OCORI | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) CLIFTON HOUSE, 75 FORT ST GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) CUTWATER2014IETBSUBSIDIARY |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 125**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CUTWATER 2015-I ETB SUBSIDIARY, LTD C/O OCORI | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) WINDWARD 3, REGATTA OFFICE PARK, PO BOX 1350 GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) CUTWATER2015IETBSUBSIDIARY |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 126**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
EATON VANCE CLO 2020-2, LTD

Employer identification number (if any)

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

**190 ELGIN AVENUE
GRAND CAYMAN, CAYMAN ISLANDS**

Reference ID number (see instructions)
EATONVANCECLO20202

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **DEC 1 2021**, and ending **NOV 30, 2022**.

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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: **4**.
- Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) \$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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 127**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) GSO BETHPAGE PARK LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) CAYMAN ISLANDS | Reference ID number (see instructions) GSOBETHPAGEPARK Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 128**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) GSO TACONIC PARK 2016-1A LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) WINDWARD 3, REGATTA OFFICE PARK, PO BOX 1350 GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) GSOTACONICPARK20161A Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **4**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 129**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) NAPIER PARK REGATTA XX LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) CAYMAN ISLANDS | Reference ID number (see instructions) NAPIERPARKREGATTAXX Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 130**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)

38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
NAPIER PARK REGATTA XXI FUNDING LTD

Employer identification number (if any)

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

Reference ID number (see instructions)
NAPIERPARKREGATTAXXI FUNDING

CAYMAN ISLANDS

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **DEC 1 2021**, and ending **NOV 30, 2022**.

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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: **3**.
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 131**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) OCTAGON INVESTMENT PARTNERS 44, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL CAYMAN ISLANDS | Reference ID number (see instructions) OCTAGONINVEST44 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 132**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) OCTAGON INVESTMENT PARTNERS 46, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL CAYMAN ISLANDS | Reference ID number (see instructions) OCTAGONINVEST46 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 133**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) OCTAGON INVESTMENT PARTNERS 48, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL CAYMAN ISLANDS | Reference ID number (see instructions) OCTAGONINVEST48 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **2**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 134**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) OCTAGON INVESTMENT PARTNERS 50, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL CAYMAN ISLANDS | Reference ID number (see instructions) OCTAGONINVEST50 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 135**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) PRUDENTIAL DRYDEN 53 CLO LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL CAYMAN ISLANDS | Reference ID number (see instructions) PRUDENTIAL53 Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 136**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) PRUDENTIAL DRYDEN 68 CLO, LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL CAYMAN ISLANDS | Reference ID number (see instructions) PRUDENTIAL68 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 137**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) PRUDENTIAL DRYDEN 85 CLO LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL CAYMAN ISLANDS | Reference ID number (see instructions) PRUDENTIAL85 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 138**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) STEAMBOAT XXIV LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) CAYMAN ISLANDS | Reference ID number (see instructions) STEAMBOATXXIV Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending JUN 28, 2022 . |

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: **PREFERRED SHARES**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 139**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) STEAMBOAT XXIX LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) CAYMAN ISLANDS | Reference ID number (see instructions) STEAMBOATXXIX Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

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: **PREFERRED SHARES**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 140**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) STEAMBOAT XXVII LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) CAYMAN ISLANDS | Reference ID number (see instructions) STEAMBOATXXVII Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending JUN 28, 2022 . |

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: **PREFERRED SHARES**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 141**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) STEAMBOAT XXVIII LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) CAYMAN ISLANDS | Reference ID number (see instructions) STEAMBOATXXVIII Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning AUG 10 2021 , and ending DEC 31, 2021 . |

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: **PREFERRED SHARES**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 142**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) STEAMBOAT XXX LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 190 ELGIN AVENUE CAYMAN ISLANDS | Reference ID number (see instructions) STEAMBOATXXX |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending APR 27, 2022 . |

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: **PREFERRED SHARES**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 143**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) STEAMBOAT XXXI LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) CAYMAN ISLANDS | Reference ID number (see instructions) STEAMBOATXXXI Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **PREFERRED SHARES**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 144**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) STEAMBOAT XXXII LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) CAYMAN ISLANDS | Reference ID number (see instructions) STEAMBOATXXXII Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 22 2021 , and ending DEC 31, 2021 . |

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: **PREFERRED SHARES**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 145**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) STEAMBOAT XXXIII LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) CAYMAN ISLANDS | Reference ID number (see instructions) STEAMBOATXXXIII Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

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: **PREFERRED SHARES**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 146**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) STEELE CREEK 2018-1 INCOME NOTES LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) STEELECREEK20181 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 147**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) STEELE CREEK 2019-1 INCOME NOTES LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL CAYMAN ISLANDS | Reference ID number (see instructions) STEELECREEK20191 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 1 2021 , and ending OCT 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 148**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) THL CREDIT LAKE SHORE MM I INCOME NOTES LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) CAYMAN ISLANDS | Reference ID number (see instructions) THLCREDITLAKESHOREMMI Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 149**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) THL CREDIT WIND RIVER 2018-1 INCOME NOTES LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) THLCREDITWINDRIVER20181 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 150**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) THL CREDIT WIND RIVER 2019-2 INCOME NOTES LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) P.O. BOX 1093, BOUNDARY HALL GRAND CAYMAN, CAYMAN ISLANDS | Reference ID number (see instructions) THLCREDITWINDRIVER20192 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning DEC 1 2021 , and ending NOV 30, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 151**

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 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 includable under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) 1 ACF-1 LTD (*) | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) FL 2, WILLOW HOUSE, CRICKET SQ. OTHER COUNTRY | Reference ID number (see instructions) 1ACF1 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1.**
- 4 Value of shares held at the end of the tax 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: **909,179.**
- 5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 152**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) A4C-1 LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) COLLAS CRILL CORPORATE SERVICES OTHER COUNTRY | Reference ID number (see instructions) A4CI Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 153**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) A4J LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) COLLAS CRILL CORPORATE SERVICES OTHER COUNTRY | Reference ID number (see instructions) A4J Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 154**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) A5J LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) FL 2, WILLOW HOUSE, CRICKET SQ. OTHER COUNTRY | Reference ID number (see instructions) A5J Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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: **1,513,245.**
- 5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 155**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) AA45-1 | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) FL 2, WILLOW HOUSE, CRICKET SQ. OTHER COUNTRY | Reference ID number (see instructions) AA451 Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 156**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

Name of shareholder
MAX M. & MARJORIE S. FISHER FOUNDATION, INC.
 Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900
 Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
 Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
AA45-2
 Employer identification number (if any)

Address (Enter number, street, city or town, and country.)
FL 2, WILLOW HOUSE, CRICKET SQ.
OTHER COUNTRY
 Reference ID number (see instructions)
AA452

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **JAN 1 2021**, and ending **DEC 31, 2021**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 157**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) AEQUITAS PORTFOLIO HOLDINGS LP | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) 20 HORSENECK LANE OTHER COUNTRY | Reference ID number (see instructions) AEQUITAS Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 158**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
AFFINITY ASIA PACIFIC FUND V LP

Employer identification number (if any)
****_*******

Address (Enter number, street, city or town, and country.)
**WALKERS CORPORATE LIMITED
OTHER COUNTRY**

Reference ID number (see instructions)
AFFINITYASIA

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **JAN 1 2020**, and ending **DEC 31, 2020**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 159**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) AP VII (PCDH AIV), LP | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) CAYMAN CORPORATE CENTER OTHER COUNTRY | Reference ID number (see instructions) APVII Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 160**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ASCENDENT SILVER (CAYMAN) LIMITED | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) STE 3501 JARDINE HSE CENTRAL OTHER COUNTRY | Reference ID number (see instructions) ASCENDENTSILVER Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 161**

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 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 includable under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

Name of shareholder: **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.** | Identifying number (see instructions): **38-1784340**

Number, street, and room or suite no. If a P.O. box, see instructions: **TWO TOWNE SQUARE, 900** | Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country: **SOUTHFIELD, MI 48076**

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
 Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): **CANGO INC** | Employer identification number (if any)

Address (Enter number, street, city or town, and country.): **10A, BLDG 3 YOYOU CENTURY PLZ OTHER COUNTRY** | Reference ID number (see instructions): **CANGO**

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **JAN 1 2021**, and ending **DEC 31, 2021**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **648.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 162**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| | Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | |
|---|--|------|-------|------|-----|------|
| | (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 | | | | | | |
| | Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | |
| 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 | | | | | | |
| | Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

Name of shareholder: **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.** | Identifying number (see instructions): **38-1784340**

Number, street, and room or suite no. If a P.O. box, see instructions: **TWO TOWNE SQUARE, 900** | Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country: **SOUTHFIELD, MI 48076**

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
 Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): **CROSS OCEAN GSS OFFSHORE FEEDER LP** | Employer identification number (if any): ****_*******

Address (Enter number, street, city or town, and country.): **ARTEMIS HOUSE 67 FORT STREET PO BOX 490 OTHER COUNTRY** | Reference ID number (see instructions): **CROSSOCEANGSSOFFSHORE**

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **JAN 1 2021**, and ending **DEC 31, 2021**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 163**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CROSS OCEAN USD ESS FUND II CAYMAN FEEDER LP | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) DANESMEAD PARTNERS LIMITED 2ND FL OTHER COUNTRY | Reference ID number (see instructions) CROSSOCEANUSDESSFUNDII |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 164**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CROSS OCEAN USD ESS FUND III CLOSED LP | Employer identification number (if any) **_***** |
| Address (Enter number, street, city or town, and country.) DANESMEAD PARTNERS LIMITED 2ND FL OTHER COUNTRY | Reference ID number (see instructions) CROSSOCEANUSDESSFUNDIII |
| | Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 165**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) CROSS OCEAN USSS FUND I (A) CAYMAN FEEDER LO | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) DANESMEAD PARTNERS LIMITED 2ND FL OTHER COUNTRY | Reference ID number (see instructions) CROSSOCEANUSSSFUNDI Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 166**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) DAZZLE CLEAN LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) C/O MAPLES CORPORATE SERVICES LIMITED OTHER COUNTRY | Reference ID number (see instructions) DAZZLECLEAN Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **3**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 167**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| | Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | |
|---|--|------|-------|------|-----|------|
| | (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 | | | | | | |
| | Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | |
| 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 | | | | | | |
| | Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) DIGILEAP CAPITAL LIMITED | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) C/O MAPLES CORPORATE SERVICES LIMITED OTHER COUNTRY | Reference ID number (see instructions) DIGILEAP Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

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: **COMMON**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: _____
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 168**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.

C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.

D **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 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 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.

G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) FARMCHOICE FOODS SDN BHD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) NO 302 OTHER COUNTRY | Reference ID number (see instructions) FARMCHOICEFOODS Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning APR 1 2020 , and ending MAR 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **641**.
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 169**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) HENDERSON PARK REAL ESTATE FUND I A EU POOL | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 1115 SEATON PLACE ST HELIER OTHER COUNTRY | Reference ID number (see instructions) HENDERSONPARK Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 170**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) JW (CAYMAN) THERAPEUTICS CO., LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) SHANGHAI, OTHER COUNTRY | Reference ID number (see instructions) JW THERAPEUTICS Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 171**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
OCEAN MAGICAL SITE HOLDINGS LIMITED

Employer identification number (if any)
****_*******

Address (Enter number, street, city or town, and country.)
**PO BOX 309, UGLAND HOUSE
OTHER COUNTRY**

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

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **VARIOUS**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **2,810,657.**
- 4 Value of shares held at the end of the tax 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: **4,156,600.**
- 5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 172**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ORBIS PROPERTIES SOCIMI SAU | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) C/O EPISO 4 LUXEMBOURG HOLDING S.A.R.L. OTHER COUNTRY | Reference ID number (see instructions) ORBISPROPERTIES Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **5,010.**
- 4 Value of shares held at the end of the tax 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: **257,315.**
- 5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 173**

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 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 includable under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D **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 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 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.
- G **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

Name of shareholder: **MAX M. & MARJORIE S. FISHER FOUNDATION, INC.** | Identifying number (see instructions): **38-1784340**

Number, street, and room or suite no. If a P.O. box, see instructions: **TWO TOWNE SQUARE, 900** | Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country: **SOUTHFIELD, MI 48076**

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
 Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF): **QUADRANT GROWTH FUND** | Employer identification number (if any)

Address (Enter number, street, city or town, and country.): **LEVEL 30 126 PHILLIP STREET SYDNEY, OTHER COUNTRY** | Reference ID number (see instructions): **QUADRANTGROWTHFUND**

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **JUL 1 2020**, and ending **JUN 30, 2021**.

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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: **209,078.**
- 5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 174**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) SHANGHAI HONGENE BIOTECH CORPORATION | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) NO 60 BEISHAGANG RD MINHANG DISTRICT, OTHER COUNTRY | Reference ID number (see instructions) SHANGHAIHONGENEBIOTECH Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

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: **PREFERRED SHARES**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 175**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) TRIDENT CO GCD CARRY (INTL) HOLDINGS LP | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) 20 HORSENECK LANE OTHER COUNTRY | Reference ID number (see instructions) TRIDENTCOGCD Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 176**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) TRIDENT CROSS OCEAN GSS GP HOLDINGS LP | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) 20 HORSENECK LANE OTHER COUNTRY | Reference ID number (see instructions) TRIDENTCROSSOCEANGSS Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 177**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate
Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
TRIDENT CROSS OCEAN USSS GP HOLDINGS LP

Employer identification number (if any)
****_*******

Address (Enter number, street, city or town, and country.)
**20 HORSENECK LANE
OTHER COUNTRY**

Reference ID number (see instructions)
TRIDENTCROSSOCEANUSSS

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning **JAN 1 2021**, and ending **DEC 31, 2021**.

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: **OTHER**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: _____
- Value of shares held at the end of the tax 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, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 178**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) TRIDENT HP EU CARRY HOLDINGS LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 20 HORSENECK LANE OTHER COUNTRY | Reference ID number (see instructions) TRIDENTHPEU Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021 , and ending DEC 31, 2021 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 179**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

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

Identifying number (see instructions)
38-1784340

Number, street, and room or suite no. If a P.O. box, see instructions.
TWO TOWNE SQUARE, 900

Shareholder tax year: calendar year **2022** or other tax year beginning and ending

City or town, state, and ZIP code or country
SOUTHFIELD, MI 48076

Check type of shareholder filing the return: Individual Corporation Partnership S Corporation Nongrantor Trust Estate

Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions

Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
TROPHY VALUE ADDED FONDO DI INVESTIMENTO

Employer identification number (if any)
****_*******

Address (Enter number, street, city or town, and country.)
**VIA MERCADANTE NO. 18
OTHER COUNTRY**

Reference ID number (see instructions)
TROPHY
Tax year of foreign corporation, PFIC, or QEF: Calendar year **2022** 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: **COMMON**
 Check if shares jointly owned with spouse.
- Date shares acquired during the tax year, if applicable: _____
- Number of shares held at the end of the tax year: **134,347.**
- Value of shares held at the end of the tax 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: **280,502.**
- Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) Section 1291 \$ _____
(b) Section 1293 (Qualified Electing Fund) \$ _____
(c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 180**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) WOW HOLDINGS LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) ORANGE POINT BUILDING OTHER COUNTRY | Reference ID number (see instructions) WOWHOLDINGS Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2020 , and ending DEC 31, 2020 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **OTHER**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **1,015.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 181**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) BP MERCURY CANADA HOLDCO ULC | Employer identification number (if any) **-***** |
| Address (Enter number, street, city or town, and country.) 1055 WEST HASTINGS ST. STE 1700 VANCOUVER, OTHER COUNTRY | Reference ID number (see instructions) BPMERCURYCANADA Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning OCT 20 2022 , and ending DEC 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **49.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 182**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) LIS SUPER TOPCO III LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 47 ESPLANADE, ST. HELIER, JE1 0BD JERSEY OTHER COUNTRY | Reference ID number (see instructions) LISUPERTOPCOIII Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 8 2022 , and ending DEC 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 183**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) XK 2 UNITED SUPER TOPCO LTD | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) 22 GRENVILLE ST., ST. HELIER, JE4 8PX JERSEY OTHER COUNTRY | Reference ID number (see instructions) XK2UNITEDSUPERTOPCO Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 24 2022 , and ending DEC 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 184**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) GURU PARTICIPACOES LTDA | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) RUA PADRE JOAO GONCALVES OTHER COUNTRY | Reference ID number (see instructions) GURU Tax year of foreign corporation, PFIC, or QEF: Calendar year 2022 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:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **101.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 185**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ADMISTRACAO DE RECUROSOS | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) AVENIDO DOS VINHEDOS OTHER COUNTRY | Reference ID number (see instructions) ADMINISTRACAODERECUROSOS Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 14 2022 , and ending FEB 2, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **3,227.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ **SEE STATEMENT 186**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. **Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D** **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 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 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.
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 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 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.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|--|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|--|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) SECURITIZADORA SA | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) AVENIDO DOS VINHEDOS OTHER COUNTRY | Reference ID number (see instructions) SECURITIZADORASA Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning OCT 10 2022 , and ending FEB 2 , 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: _____
- 4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
 (a) \$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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 187**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|--|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | 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 regulations | 14c | |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | | |
|---|-----|------|-------|------|-----|------|
| | (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 | | | | | | |
| Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | | |
| 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 | | | | | | |
| Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

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

▶ Go to www.irs.gov/Form8621 for instructions and the latest information.

| | |
|---|---|
| Name of shareholder MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
| Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | Shareholder tax year: calendar year 2022 or other tax year beginning and ending |
| City or town, state, and ZIP code or country SOUTHFIELD, MI 48076 | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions <input type="checkbox"/> | |
| Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions <input type="checkbox"/> | |
| Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) HOLDINGS FINANCEIRA LTDA | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) AVENIDO DOS VINHEDOS OTHER COUNTRY | Reference ID number (see instructions) HOLDINGSFINANCEIRA Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning SEP 13 2022 , and ending MAR 31, 2022 . |

Part I Summary of Annual Information (see instructions)

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **COMMON**
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the tax year, if applicable: _____
- 3 Number of shares held at the end of the tax year: **208.**
- 4 Value of shares held at the end of the tax 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 under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
 (a) Section 1291 \$ _____
 (b) Section 1293 (Qualified Electing Fund) \$ _____
 (c) Section 1296 (Mark to Market) \$ _____ **SEE STATEMENT 188**

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 time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*
Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C** **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D** **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 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 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.*
- G** **Deemed Dividend Election With Respect to a Section 1297(e) PFIC.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 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 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.*

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. 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 | 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 in Part II of the Schedule D used for your income tax return. See instructions | | | 7c |

Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the current tax year.

| | | | | |
|--|--|-----------|--|-----------|
| 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 |
| e | Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) | | | 8e |
| Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible 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 |

Part IV Gain or (Loss) From Mark-to-Market Election (see instructions)

| | | | |
|------------|---|------------|------------|
| 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 | |
| c | Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income 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. 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: | | |
| 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 | |
| c | Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income 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. 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 | | 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 regulations | | 14c |

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

Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)

Complete a separate Part V for each excess distribution and disposition. See instructions.

| | | |
|---|-------------------|--|
| <p>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</p> | <p>15a</p> | |
| <p>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)</p> | <p>15b</p> | |
| <p>c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.)</p> | <p>15c</p> | |
| <p>d Multiply line 15c by 125% (1.25)</p> | <p>15d</p> | |
| <p>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</p> | <p>15e</p> | |
| <p>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</p> | <p>15f</p> | |
| <p>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. Add all amounts that are allocated to days in each tax year.</p> | | |
| <p>b Enter the total of the amounts determined in line 16a 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</p> | <p>16b</p> | |
| <p>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</p> | <p>16c</p> | |
| <p>d Foreign tax credit (see instructions)</p> | <p>16d</p> | |
| <p>e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions</p> | <p>16e</p> | |
| <p>f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions</p> | <p>16f</p> | |

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

| | Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. | | | | | |
|---|--|------|-------|------|-----|------|
| | (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 | | | | | | |
| | Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. | | | | | |
| 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 | | | | | | |
| | Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. | | | | | |
| 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19 | | | | | | |
| 26 Interest accrued after partial termination of election. Subtract line 24 from line 20 | | | | | | |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 29

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

EAGLE POINT CREDIT PARTNERS SUB III LTD
C/O CITCO TRUSTEES (CAYMAN) LIMITED

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 10.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 30

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

MARATHON CLO VI, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 168.000 | | | 2.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 31

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

AVERY POINT V INVESTOR, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 32

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

MADISON PARK FUNDING XL, LTD
FKA ATRIUM IX

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 480.000 | | | 5.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 33

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GLOBAL MARKET STRATEGIES
CLO 2014-5, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 461.000 | | | 4.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 34

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

MARATHON CLO VII, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 230.000 | | | 2.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 35

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

MADISON PARK FUNDING XXI, LTD.

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 421.000 | | | 4.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 36

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ZAIS CLO 5, LIMITED

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 246.000 | | | 2.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 37

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

MARATHON CLO X LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 96.000 | | | 1.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 38

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

STEELE CREEK CLO 2015-1, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 297.000 | | | 3.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 39

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

EAGLE POINT CREDIT NON-US LP

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 40

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ALM VIII, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|------------------|---|----------------------------------|-------------------|--|--|
| PREFERRED SHARES | 1.000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 41

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

MADISON PARK FUNDING XLIV, LTD
FKA ATRIUM XV

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 367.000 | | | 4.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 42

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CIFC FUNDING 2018-V LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 77.000 | | 01/01/22 | 1.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 43

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

DRYDEN 66 EURO CLO 2018 BV

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 37.000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 44

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

HARBOURVIEW CLO VII-R, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 45

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

MADISON PARK FUNDING XXII, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 215.000 | | 01/01/22 | 2.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 46

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

MARATHON CLO XI LTD
C/O WALKERS FIDUCIARY LIMITED

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 73.000 | | 01/01/22 | 1.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 47

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

MARATHON CLO XII LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 153.000 | | 01/01/22 | 2.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 48

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

OCTAGON INVESTMENT PARTNERS 38, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 84.000 | | 01/01/22 | 1.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 49

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

OFSI BSL IX LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 15.000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 50

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ZAIS CLO 8, LIMITED

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 25.000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 51

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ZAIS CLO 9, LIMITED

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 106.000 | | | 1.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 52

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ZAIS INCOME NOTE 7 LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 197.000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 53

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CIFC FUNDING 2019-III, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 112.000 | | 01/01/22 | 1.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 54

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

MARATHON CLO VIII INCOME NOTE ISSUER LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 36.000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 55

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ARES XXXIV CLO LTD.

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 719.000 | | 01/01/22 | 2.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 56

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ARES XXXIV CLO TAX SUBSIDIARY LTD.

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 09/28/22 | 9.000 | 3.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 57

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BAIN CAPITAL CREDIT MASTER 110 DAC

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 58

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BLUEMOUNTAIN CLO 2018-1

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 223.000 | | 01/01/22 | 2.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 59

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BLUE MOUNTAIN CLO XXII LTD.

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 306.000 | | 01/01/22 | 3.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 60

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BLUE MOUNTAIN CLO XXIV LTD.

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 374.000 | | 01/01/22 | 4.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 61

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BLUE MOUNTAIN CLO XXV LTD.

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 328.000 | | 01/01/22 | 3.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 62

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GLOBAL MARKET STRATEGIES
CLO 2014-5 - BLOCKER 2, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 63

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE US CLO 2017-4 - BLOCKER, LTD.

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 64

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE US CLO 2017-5, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | 516.000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 65

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

EAGLE POINT CREDIT GP I-A LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 66

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

EATON VANCE 2015-1, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 322.000 | | 01/01/22 | 3.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 67

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

GOLDMAN SACHS US \$ TREASURY LIQUID RESERVES

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 493.000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 68

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

MARATHON CLO IX, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 359.000 | | | 3.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 69

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BATTALION CLO IX INCOME NOTE ISSUER
LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 30.000 | | | | |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 70

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ANCHORAGE CREDIT FUNDING 13, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 50.000 | | 01/01/22 | 1.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 71

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BARINGS CLO LTD, 2018-IV

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 112.000 | | 05/11/22 | 4.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 72

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BLUEMOUNTAIN CLO XXIII LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 286.000 | | 01/01/22 | 3.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 73

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE US CLO 2017-4 INCOME NOTE, LTD.

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 45.000 | | | | |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 74

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE US CLO 2018-1, LTD.

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 106.000 | | | | |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 75

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CATSKILL PARK CLO, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 209.000 | | 01/01/22 | 2.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 76

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

EAGLE POINT CREDIT PARTNERS SUB IV LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 77

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

EAGLE POINT CREDIT PARTNERS SUB LLC -
EPCP LP

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 235.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 78

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

NAPIER PARK REGATTA VII, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 245.000 | | 01/01/22 | 3.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 79

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

NEUBERGER BERMAN LOAN ADVISERS CLO 34 LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 121.000 | | 01/01/22 | 1.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 80

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

NORTHWOODS CAPITAL XI-B, LIMITED

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 209.000 | | | 2.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 81

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

OCP EURO CLO 2019-3 DAC

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 62.000 | | 01/01/22 | 1.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 82

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

OCTAGON INVESTMENT PARTNERS 29, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 403.000 | | 01/01/22 | 4.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 83

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

OCTAGON INVESTMENT PARTNERS 32, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 41.000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 84

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

OCTAGON INVESTMENT PARTNERS 37, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 64.000 | | 01/01/22 | 1.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 85

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

OCTAGON INVESTMENT PARTNERS 40, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 93.000 | | 01/01/22 | 1.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 86

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

PRUDENTIAL DRYDEN 64 CLO, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 488.000 | | 01/01/22 | 5.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 87

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

PRUDENTIAL DRYDEN 75 CLO, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 449.000 | | 01/01/22 | 5.000 | 4.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 88

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

PRUDENTIAL DRYDEN 78 CLO, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 45.000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 89

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

PRUDENTIAL DRYDEN 88 EURO CLO 2020 DAC

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 25.000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 90

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

THL CREDIT WIND RIVER 2014-1 CLO LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | 413.000 | | | 4.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 91

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

VENTURE 41 CLO, LIMITED

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | 1.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 92

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

GXP GERMAN PROPERTIES AG

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | 10,404.000 | 76,174.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 93

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ANCHORAGE CREDIT FUNDING 12-C, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 94

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ARES INCOME NOTE LI LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 95

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ARES LVIII CLO LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | 2.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 96

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BARINGS CLO LTD, 2019-I, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 97

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BARINGS INCOME NOTE LTD. 2020-I

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 98

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BATTALION CLO 18 INCOME NOTE LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 99

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BATTALION CLO IX LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 100

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BATTALION CLO XIX INCOME NOTE LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 101

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GLOBAL MARKET STRATEGIES
CLO 2014-5 LTD - BLOCKER

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 102

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GMS
2017-4 INCOME NOTE, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | 1.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 103

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GMS
2017-4 INCOME NOTE - BLOCKER

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 104

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GMS
2017-5, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | 5.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 105

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GMS
2018-1 - BLOCKER

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 106

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GMS
2018-1 - BLOCKER 2

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 107

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GMS
2018-1, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | 1.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 108

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GMS
2018-4 - BLOCKER

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 109

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GMS
2018-4, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | 3.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 110

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GMS
2021-1, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 111

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GMS
2021-4, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 112

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE GMS
2021-7, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 113

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE US 2018-4 BLOCKER 2

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 114

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE US 2021-1 BLOCKER

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 115

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE US 2021-4 BLOCKER

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 116

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE US 2021-7 BLOCKER

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 117

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE US CLO 2017-4 - BLOCKER 2, LTD.

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 118

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CARLYLE US CLO 2017-5 - BLOCKER 2, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 119

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CIFC FUNDING 2019-IV INVESTOR, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 120

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CIFC FUNDING 2020-I INVESTOR, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 121

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CIFC FUNDING 2020-IV INVESTOR, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 122

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CIFC FUNDING 2021-III INVESTOR, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | 1.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 123

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CIFC FUNDING 2021-VI INVESTOR, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 124

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CSAM MADISON PARK FUNDING XXXIV, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 09/27/22 | 3.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 125

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CUTWATER 2014-I ETB SUBSIDIARY, LTD
C/O OCORI

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 126

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CUTWATER 2015-I ETB SUBSIDIARY, LTD
C/O OCORI

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 127

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

EATON VANCE CLO 2020-2, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 09/16/22 | 4.000 | 3.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 128

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

GSO BETHPAGE PARK LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 129

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

GSO TACONIC PARK 2016-1A LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/14/22 | 4.000 | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 130

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

NAPIER PARK REGATTA XX LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 131

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

NAPIER PARK REGATTA XXI FUNDING LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 06/10/22 | 3.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 132

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

OCTAGON INVESTMENT PARTNERS 44, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 133

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

OCTAGON INVESTMENT PARTNERS 46, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | 1.000 | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 134

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

OCTAGON INVESTMENT PARTNERS 48, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 07/25/22 | 2.000 | 2.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 135

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

OCTAGON INVESTMENT PARTNERS 50, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 136

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

PRUDENTIAL DRYDEN 53 CLO LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 137

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

PRUDENTIAL DRYDEN 68 CLO, LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 138

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

PRUDENTIAL DRYDEN 85 CLO LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 139

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

STEAMBOAT XXIV LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|------------------|---|----------------------------------|-------------------|--|--|
| PREFERRED SHARES | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 140

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

STEAMBOAT XXIX LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|------------------|---|----------------------------------|-------------------|--|--|
| PREFERRED SHARES | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 141

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

STEAMBOAT XXVII LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|------------------|---|----------------------------------|-------------------|--|--|
| PREFERRED SHARES | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 142

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

STEAMBOAT XXVIII LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|------------------|---|----------------------------------|-------------------|--|--|
| PREFERRED SHARES | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 143

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

STEAMBOAT XXX LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|------------------|---|----------------------------------|-------------------|--|--|
| PREFERRED SHARES | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 144

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

STEAMBOAT XXXI LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|------------------|---|----------------------------------|-------------------|--|--|
| PREFERRED SHARES | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 145

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

STEAMBOAT XXXII LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|------------------|---|----------------------------------|-------------------|--|--|
| PREFERRED SHARES | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 146

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

STEAMBOAT XXXIII LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|------------------|---|----------------------------------|-------------------|--|--|
| PREFERRED SHARES | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 147

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

STEELE CREEK 2018-1 INCOME NOTES LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 148

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

STEELE CREEK 2019-1 INCOME NOTES LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 149

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

THL CREDIT LAKE SHORE MM I INCOME NOTES LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 150

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

THL CREDIT WIND RIVER
2018-1 INCOME NOTES LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 151

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

THL CREDIT WIND RIVER
2019-2 INCOME NOTES LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 152

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

1 ACF-1 LTD (*)

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | 1.000 | 909,179.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 153

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

A4C-1 LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 154

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

A4J LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 155

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

A5J LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 1513245.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 156

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

AA45-1

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 75,619.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 157

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

AA45-2

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 75,619.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 158

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

AEQUITAS PORTFOLIO HOLDINGS LP

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 159

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

AFFINITY ASIA PACIFIC FUND V LP

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 4,611.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 160

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

AP VII (PCDH AIV), LP

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | 01/01/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 161

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ASCENDENT SILVER (CAYMAN) LIMITED

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 8,993.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 162

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CANGO INC

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | 648.000 | 1,016.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 163

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CROSS OCEAN GSS OFFSHORE FEEDER LP

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 164

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CROSS OCEAN USD ESS FUND II CAYMAN FEEDER LP

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 165

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CROSS OCEAN USD ESS FUND III CLOSED LP

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 166

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

CROSS OCEAN USSS FUND I (A) CAYMAN FEEDER LO

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 167

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

DAZZLE CLEAN LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | 3.000 | 11,382.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 168

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

DIGILEAP CAPITAL LIMITED

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 1,126.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 169

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

FARMCHOICE FOODS SDN BHD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | 641.000 | 1,262.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 170

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

HENDERSON PARK REAL ESTATE FUND I A EU POOL

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 171

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

JW (CAYMAN) THERAPEUTICS CO., LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 172

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

OCEAN MAGICAL SITE HOLDINGS LIMITED

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| VARIOUS | .000 | | | 2810657 | 4156600.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 173

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ORBIS PROPERTIES SOCIMI SAU

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | 01/01/22 | 5,010.000 | 257,315.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 174

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

QUADRANT GROWTH FUND

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 209,078.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 175

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

SHANGHAI HONGENE BIOTECH CORPORATION

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|------------------|---|----------------------------------|-------------------|--|--|
| PREFERRED SHARES | .000 | | | | 18.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 176

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

TRIDENT CO GCD CARRY (INTL) HOLDINGS LP

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 177

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

TRIDENT CROSS OCEAN GSS GP HOLDINGS LP

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 178

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

TRIDENT CROSS OCEAN USSS GP HOLDINGS LP

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 179

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

TRIDENT HP EU CARRY HOLDINGS LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 180

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

TROPHY VALUE ADDED FONDO DI INVESTIMENTO

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | 134347.000 | 280,502.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 181

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

WOW HOLDINGS LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| OTHER | .000 | | | 1,015.000 | 57,693.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 182

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

BP MERCURY CANADA HOLDCO ULC

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | 10/20/22 | 49.000 | 78,998.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 183

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

LIS SUPER TOPCO III LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | 11/08/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 184

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

XK 2 UNITED SUPER TOPCO LTD

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | 11/24/22 | | 0.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 185

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

GURU PARTICIPACOES LTDA

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | 101.000 | 19.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 186

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

ADMISTRACAO DE RECURSOS

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | 3,227.000 | 4,697.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 187

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

SECURITIZADORA SA

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | | 1.00 |

FORM 8621

ADDITIONAL INFORMATION

STATEMENT 188

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

HOLDINGS FINANCEIRA LTDA

| CLASS OF STOCK | NUMBER OF SHARES AT BEGINING OF YEAR | CHANGE IN NUMBER OF SHARES | DATE OF CHANGE | NUMBER OF SHARES AT END OF YEAR | VALUE OF SHARES HELD AT END OF YEAR |
|----------------|---|----------------------------------|-------------------|--|--|
| COMMON | .000 | | | 208.000 | 142.00 |

Limitation on Business Interest Expense Under Section 163(j)

Attach to your tax return.

Go to www.irs.gov/Form8990 for instructions and the latest information.

| | |
|--|--|
| Taxpayer name(s) shown on tax return MAX M. & MARJORIE S. FISHER FOUNDATION, | Identification number 38-1784340 |
|--|--|

- A** If Form 8990 relates to an information return for a foreign entity (for example, Form 5471), enter:
 Name of foreign entity _____
 Employer identification number, if any _____
 Reference ID number _____
- B** Is the foreign entity a CFC group member? See instructions Yes No
- C** Is this Form 8990 filed by the specified group parent for an entire CFC group? See instructions Yes No
- D** Has a CFC or a CFC group made a safe harbor election? If yes, see instructions for which lines of Form 8990
 to complete Yes No

Part I Computation of Allowable Business Interest Expense

Part I is completed by all taxpayers subject to section 163(j). Schedule A and Schedule B need to be completed before Part I when the taxpayer is a partner or shareholder of a pass-through entity subject to section 163(j).

Section I - Business Interest Expense

| | | | | | |
|---|----------|--|--|----------|--|
| 1 Current year business interest expense (not including floor plan financing interest expense), before the section 163(j) limitation | 1 | | | | |
| 2 Disallowed business interest expense carryforwards from prior years. (Does not apply to a partnership) | 2 | | | | |
| 3 Partner's excess business interest expense treated as paid or accrued in current year (Schedule A, line 44, column (h)) | 3 | | | | |
| 4 Floor plan financing interest expense. See instructions | 4 | | | | |
| 5 Total business interest expense. Add lines 1 through 4 | | | | 5 | |

Section II - Adjusted Taxable Income

Tentative Taxable Income

| | | |
|---|----------|--|
| 6 Tentative taxable income. See instructions | 6 | |
|---|----------|--|

Additions (adjustments to be made if amounts are taken into account on line 6)

| | | | | | |
|--|-----------|--|--|-----------|--|
| 7 Any item of loss or deduction that is not properly allocable to a trade or business of the taxpayer. See instructions | 7 | | | | |
| 8 Any business interest expense not from a pass-through entity. See instr. ... | 8 | | | | |
| 9 Amount of any net operating loss deduction under section 172 | 9 | | | | |
| 10 Amount of any qualified business income deduction allowed under section 199A | 10 | | | | |
| 11 Reserved for future use | 11 | | | | |
| 12 Amount of any loss or deduction items from a pass-through entity. See instructions | 12 | | | | |
| 13 Other additions. See instructions | 13 | | | | |
| 14 Total current year partner's excess taxable income (Schedule A, line 44, column (f)) | 14 | | | | |
| 15 Total current year S corporation shareholder's excess taxable income (Schedule B, line 46, column (c)) | 15 | | | | |
| 16 Total. Add lines 7 through 15 | | | | 16 | |

Reductions (adjustments to be made if amounts are taken into account on line 6)

| | | | | | |
|--|---------------|--|--|---------------|--|
| 17 Any item of income or gain that is not properly allocable to a trade or business of the taxpayer. See instructions | 17 () | | | | |
| 18 Any business interest income not from a pass-through entity. See instructions | 18 () | | | | |
| 19 Amount of any income or gain items from a pass-through entity. See instructions | 19 () | | | | |
| 20 Other reductions. See instructions SEE STATEMENT 189 | 20 () | | | | |
| 21 Total. Combine lines 17 through 20 | | | | 21 () | |
| 22 Adjusted taxable income. Combine lines 6, 16, and 21. See instructions | | | | 22 | |

Section III - Business Interest Income

| | | | | |
|-----------|--|-----------|-----------|--|
| 23 | Current year business interest income. See instructions | 23 | | |
| 24 | Excess business interest income from pass-through entities (total of Schedule A, line 44, column (g), and Schedule B, line 46, column (d)) | 24 | | |
| 25 | Total. Add lines 23 and 24 | | 25 | |

Section IV - Section 163(j) Limitation Calculations

Limitation on Business Interest Expense

| | | | | |
|-----------|--|-----------|-----------|--|
| 26 | Multiply the adjusted taxable income from line 22 by the applicable percentage. See instructions | 26 | | |
| 27 | Business interest income (line 25) | 27 | | |
| 28 | Floor plan financing interest expense (line 4) | 28 | | |
| 29 | Total. Add lines 26, 27, and 28 | | 29 | |

Allowable Business Interest Expense

| | | | | |
|-----------|---|--|-----------|--|
| 30 | Total current year business interest expense deduction. See instructions | | 30 | |
|-----------|---|--|-----------|--|

Carryforward

| | | | | |
|-----------|--|--|-----------|--|
| 31 | Disallowed business interest expense. Subtract line 29 from line 5. (If zero or less, enter -0-.) | | 31 | |
|-----------|--|--|-----------|--|

Part II Partnership Pass-Through Items

Part II is only completed by a partnership that is subject to section 163(j). The partnership items below are allocated to the partners and are not carried forward by the partnership. See the instructions for more information.

Excess Business Interest Expense

| | | | | |
|-----------|--|--|-----------|--|
| 32 | Excess business interest expense. Enter amount from line 31 | | 32 | |
|-----------|--|--|-----------|--|

Excess Taxable Income (If you entered an amount on line 32, skip lines 33 through 37.)

| | | | | |
|-----------|--|-----------|--|--|
| 33 | Subtract the sum of lines 4 and 25 from line 5. (If zero or less, enter -0-.) | 33 | | |
| 34 | Subtract line 33 from line 26. (If zero or less, enter -0-.) | 34 | | |
| 35 | Divide line 34 by line 26. Enter the result as a decimal. (If line 26 is zero, enter -0-.) | 35 | | |
| 36 | Excess taxable income. Multiply line 35 by line 22 | 36 | | |

Excess Business Interest Income

| | | | | |
|-----------|---|--|-----------|--|
| 37 | Excess business interest income. Subtract the sum of lines 1, 2, and 3 from line 25. (If zero or less, enter -0-.) | | 37 | |
|-----------|---|--|-----------|--|

Part III S Corporation Pass-Through Items

Part III is only completed by S corporations that are subject to section 163(j). The S corporation items below are allocated to the shareholders. See the instructions for more information.

Excess Taxable Income

| | | | | |
|-----------|--|-----------|--|--|
| 38 | Subtract the sum of lines 4 and 25 from line 5. (If zero or less, enter -0-.) | 38 | | |
| 39 | Subtract line 38 from line 26. (If zero or less, enter -0-.) | 39 | | |
| 40 | Divide line 39 by line 26. Enter the result as a decimal. (If line 26 is zero, enter -0-.) | 40 | | |
| 41 | Excess taxable income. Multiply line 40 by line 22 | 41 | | |

Excess Business Interest Income

| | | | | |
|-----------|---|--|-----------|--|
| 42 | Excess business interest income. Subtract the sum of lines 1, 2, and 3 from line 25. (If zero or less, enter -0-.) | | 42 | |
|-----------|---|--|-----------|--|

FORM 8990

OTHER REDUCTIONS

STATEMENT 189

DESCRIPTION

AMOUNT

FLOOR PLAN FINANCING INTEREST EXPENSE

0.

TOTAL TO PAGE 1, LINE 20

0.

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

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

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

| | |
|---|--|
| Name of transferor MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Identifying number (see instructions) 38-1784340 |
|---|--|

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

| Controlling shareholder | Identifying number |
|-------------------------|--------------------|
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |

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

| Name of parent corporation | EIN of parent corporation |
|----------------------------|---------------------------|
| | |

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

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

| Name of partnership | EIN of partnership |
|---|--------------------|
| NB SELECT OPPORTUNITES FUND V LP | 87-1809069 |

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

Part II Transferee Foreign Corporation Information (see instructions)

| | |
|---|-------------------------------|
| Name of transferee (foreign corporation) OLYMPUS JERSEY TOPCO LIMITED | 5a Identifying number, if any |
|---|-------------------------------|

| | |
|--|--|
| Address (including country) 26 NEW STREET ST. HELIER, JE2 3RA JERSEY | 5b Reference ID number OLYMPUSJERSEYTO |
|--|--|

7 Country code of country of incorporation or organization
JE

8 Foreign law characterization (see instructions)
CORPORATION

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

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

| Type of property | (a) Date of transfer | (b) Description of property | (c) Fair market value on date of transfer | (d) Cost or other basis | (e) Gain recognized on transfer |
|------------------|-------------------------|--------------------------------|--|----------------------------|------------------------------------|
| Cash | | | 139,171. | | |

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

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

| Type of property | (a) Date of transfer | (b) Description of property | (c) Fair market value on date of transfer | (d) Cost or other basis | (e) Gain recognized on transfer |
|--|-------------------------|--------------------------------|--|----------------------------|------------------------------------|
| Stock and securities | | | | | |
| Inventory | | | | | |
| Other property (not listed under another category) | | | | | |
| Property with built-in loss | | | | | |
| Totals | | | | | |

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

12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? **Yes** **No**
 If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? **Yes** **No**
 If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? **Yes** **No**
 If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

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

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

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

| Type of property | (a) Date of transfer | (b) Description of property | (c) Useful life | (d) Arm's length price on date of transfer | (e) Cost or other basis | (f) Income inclusion for year of transfer |
|--------------------------------------|-------------------------|--------------------------------|--------------------|---|----------------------------|--|
| Property described in sec. 367(d)(4) | | | | | | |
| Totals | | | | | | |

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

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

CASH TRANSFERS OCCURRED ON VARIOUS DATES DURING THE YEAR ENDED 12/31/22.

Part IV Additional Information Regarding Transfer of Property (see instructions)

- 16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
(a) Before .000 % (b) After .000 %
- 17 Type of nonrecognition transaction (see instructions) ▶ _____
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
 - a Gain recognition under section 904(f)(3) Yes No
 - b Gain recognition under section 904(f)(5)(F) Yes No
 - c Recapture under section 1503(d) Yes No
 - d Exchange gain under section 987 Yes No
- 19 Did this transfer result from a change in entity classification? Yes No
- 20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) Yes No
If "Yes," complete lines 20b and 20c.
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ _____
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions Yes No

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

Department of the Treasury
Internal Revenue Service

▶ **File a separate application for each return.**
▶ **Go to www.irs.gov/Form8868 for the latest information.**

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

| | | |
|--|--|---|
| Type or print | Name of exempt organization or other filer, see instructions. MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Taxpayer identification number (TIN) 38-1784340 |
| File by the due date for filing your return. See instructions. | Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | |
| | City, town or post office, state, and ZIP code. For a foreign address, see instructions. SOUTHFIELD, MI 48076 | |

Enter the Return Code for the return that this application is for (file a separate application for each return) 0 | 7

| Application Is For | Return Code | Application Is For | Return Code |
|--|-------------|-----------------------------------|-------------|
| Form 990 or Form 990-EZ | 01 | Form 1041-A | 08 |
| Form 4720 (individual) | 03 | Form 4720 (other than individual) | 09 |
| Form 990-PF | 04 | Form 5227 | 10 |
| Form 990-T (sec. 401(a) or 408(a) trust) | 05 | Form 6069 | 11 |
| Form 990-T (trust other than above) | 06 | Form 8870 | 12 |
| Form 990-T (corporation) | 07 | | |

EMILY DIEGEL

- The books are in the care of ▶ **TWO TOWNE SQUARE #900 - SOUTHFIELD, MI 48076**

Telephone No. ▶ **248-415-1440** Fax No. ▶ _____

- If the organization does not have an office or place of business in the United States, check this box
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) _____. If this is for the whole group, check this box . If it is for part of the group, check this box and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6-month extension of time until **NOVEMBER 15, 2023**, to file the exempt organization return for the organization named above. The extension is for the organization's return for:
▶ calendar year **2022** or
▶ tax year beginning _____, and ending _____.

2 If the tax year entered in line 1 is for less than 12 months, check reason: Initial return Final return
 Change in accounting period

| | | |
|---|-----------|--------------------|
| 3a If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions. | 3a | \$ 0. |
| b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. | 3b | \$ 125,000. |
| c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions. | 3c | \$ 0. |

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.

TAX RETURN FILING INSTRUCTIONS

CALIFORNIA FORM 199

FOR THE YEAR ENDING

DECEMBER 31, 2022

PREPARED FOR:

MS. EMILY DIEGEL
MAX M. & MARJORIE S. FISHER FOUNDATION
TWO TOWNE SQUARE 900
SOUTHFIELD, MI 48076

PREPARED BY:

PLANTE & MORAN, PLLC
2601 CAMBRIDGE CT., STE. 300
AUBURN HILLS, MI 48326

TO BE SIGNED AND DATED BY:

THE AUTHORIZED INDIVIDUAL(S).

AMOUNT OF TAX:

| | | |
|------------------------------|----|---|
| TOTAL TAX | \$ | 0 |
| LESS: PAYMENTS AND CREDITS | \$ | 0 |
| PLUS: OTHER AMOUNT | \$ | 0 |
| PLUS: INTEREST AND PENALTIES | \$ | 0 |
| NO PAYMENT IS REQUIRED | \$ | |

OVERPAYMENT:

| | | |
|--------------------------------|----|---|
| CREDITED TO YOUR ESTIMATED TAX | \$ | 0 |
| OTHER AMOUNT | \$ | 0 |
| REFUNDED TO YOU | \$ | 0 |

MAKE CHECK PAYABLE TO:

NOT APPLICABLE

MAIL TAX RETURN AND CHECK (IF APPLICABLE) TO:

FRANCHISE TAX BOARD
P.O. BOX 942857
SACRAMENTO, CA 94257-0500

RETURN MUST BE MAILED ON OR BEFORE:

NOVEMBER 15, 2023

SPECIAL INSTRUCTIONS:

REQUIRED ATTACHMENTS FROM THE FEDERAL RETURN, FORM 990-PF, HAVE BEEN ATTACHED TO THE FILING COPY OF THIS RETURN.

California Exempt Organization Annual Information Return

Calendar Year 2022 or fiscal year beginning (mm/dd/yyyy) _____, and ending (mm/dd/yyyy) _____

Corporation/Organization name
MAX M. & MARJORIE S. FISHER FOUNDATION, INC.

California corporation number
8007302

Additional information. See instructions.

FEIN
38-1784340

Street address (suite or room)
TWO TOWNE SQUARE, NO. 900

PMB no.

City
SOUTHFIELD

State
MI

ZIP code
48076

Foreign country name

Foreign province/state/county

Foreign postal code

A First return Yes No

B Amended return Yes No

C IRC Section 4947(a)(1) trust Yes No

D Final information return?
 Dissolved Surrendered (Withdrawn) Merged/Reorganized
 Enter date: (mm/dd/yyyy) _____

E Check accounting method: (1) Cash (2) Accrual (3) Other

F Federal return filed? (1) 990T (2) 990PF (3) Sch H (990) (4) Other 990 series

G Is this a group filing? See instructions Yes No

H Is this organization in a group exemption Yes No
If "Yes," what is the parent's name? _____

I Did the organization have any changes to its guidelines not reported to the FTB? See instructions Yes No

J If exempt under R&TC Section 23701d, has the organization engaged in political activities? See instructions. Yes No

K Is the organization exempt under R&TC Section 23701g? Yes No
If "Yes," enter the gross receipts from nonmember sources \$ _____

L Is the organization a limited liability company? Yes No

M Did the organization file Form 100 or Form 109 to report taxable income? Yes No

N Is the organization under audit by the IRS or has the IRS audited in a prior year? Yes No

O Is federal Form 1023/1024 pending? Yes No
Date filed with IRS _____

Part I Complete Part I unless not required to file this form. See General Information B and C.

| | | | | | |
|------------------------------|----|--|----|-------------|----|
| Receipts and Revenues | 1 | Gross sales or receipts from other sources. From Side 2, Part II, line 8 | 1 | 113,272,964 | 00 |
| | 2 | Gross dues and assessments from members and affiliates | 2 | | 00 |
| | 3 | Gross contributions, gifts, grants, and similar amounts received | 3 | | 00 |
| | 4 | Total gross receipts for filing requirement test. Add line 1 through line 3. This line must be completed. If the result is less than \$50,000, see General Information B | 4 | 113,272,964 | 00 |
| | 5 | Cost of goods sold | 5 | | 00 |
| | 6 | Cost or other basis, and sales expenses of assets sold | 6 | 117,383,654 | 00 |
| | 7 | Total costs. Add line 5 and line 6 | 7 | 117,383,654 | 00 |
| | 8 | Total gross income. Subtract line 7 from line 4 | 8 | -4,110,690 | 00 |
| Expenses | 9 | Total expenses and disbursements. From Side 2, Part II, line 18 | 9 | 23,053,908 | 00 |
| | 10 | Excess of receipts over expenses and disbursements. Subtract line 9 from line 8 | 10 | -27,164,598 | 00 |
| Filing Fee | 11 | Total payments | 11 | | 00 |
| | 12 | Use tax. See General Information K | 12 | | 00 |
| | 13 | Payments balance. If line 11 is more than line 12, subtract line 12 from line 11 | 13 | | 00 |
| | 14 | Use tax balance. If line 12 is more than line 11, subtract line 11 from line 12 | 14 | | 00 |
| | 15 | Penalties and interest. See General Information J | 15 | | 00 |
| | 16 | Balance due. Add line 12 and line 15. Then subtract line 11 from the result | 16 | | 00 |

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 taxpayer) is based on all information of which preparer has any knowledge.

Sign Here

Signature of officer Title **EXECUTIVE DIRE** Date _____ Telephone **248-415-1444**

Preparer's signature **DORI J. EGGETT** Date **11/08/23** Check if self-employed PTIN **P00645252**

Paid Preparer's Use Only

Firm's name (or yours, if self-employed) and address **PLANTE & MORAN, PLLC
2601 CAMBRIDGE CT., STE. 300
AUBURN HILLS, MI 48326** Firm's FEIN **38-1357951** Telephone **(248) 375-7100**

May the FTB discuss this return with the preparer shown above? See instructions Yes No

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

| | | | | | | | |
|------------------------------------|-----------------------------------|--|---|----|-------------|------------|----|
| Receipts from Other Sources | 1 | Gross sales or receipts from all business activities. See instructions | • | 1 | | 00 | |
| | 2 | Interest | • | 2 | | 00 | |
| | 3 | Dividends | • | 3 | 5,600,731 | 00 | |
| | 4 | Gross rents | • | 4 | | 00 | |
| | 5 | Gross royalties | • | 5 | | 00 | |
| | 6 | Gross amount received from sale of assets (See instructions) STATEMENT 1 | • | 6 | 109,789,612 | 00 | |
| | 7 | Other income | • | 7 | -2,117,379 | 00 | |
| | 8 | Total gross sales or receipts from other sources. Add line 1 through line 7. Enter here and on Side 1, Part I, line 1 | • | 8 | 113,272,964 | 00 | |
| | 9 | Contributions, gifts, grants, and similar amounts paid | • | 9 | 17,362,342 | 00 | |
| | 10 | Disbursements to or for members | • | 10 | | 00 | |
| | 11 | Compensation of officers, directors, and trustees SEE STATEMENT 2 | • | 11 | 448,049 | 00 | |
| | 12 | Other salaries and wages | • | 12 | 1,099,681 | 00 | |
| | Expenses and Disbursements | 13 | Interest | • | 13 | 13,410 | 00 |
| | | 14 | Taxes | • | 14 | 211,721 | 00 |
| | | 15 | Rents | • | 15 | 5,967 | 00 |
| | | 16 | Depreciation and depletion (See instructions) | • | 16 | 6,870 | 00 |
| | | 17 | Other expenses and disbursements SEE STATEMENT 3 | • | 17 | 3,905,868 | 00 |
| | | 18 | Total expenses and disbursements. Add line 9 through line 17. Enter here and on Side 1, Part I, line 9 | • | 18 | 23,053,908 | 00 |

| Schedule L Balance Sheet | Beginning of taxable year | | End of taxable year | |
|--|---------------------------|-------------|---------------------|---------------|
| | (a) | (b) | (c) | (d) |
| Assets | | | | |
| 1 Cash | | 8,772,347 | | • 10,365,821 |
| 2 Net accounts receivable | | 617,442 | | • 209,931 |
| 3 Net notes receivable | | | | • |
| 4 Inventories | | | | • |
| 5 Federal and state government obligations | | | | • |
| 6 Investments in other bonds | | | | • |
| 7 Investments in stock | | | | • |
| 8 Mortgage loans | | | | • |
| 9 Other investments STMT 4 | | 324,612,769 | | • 262,578,768 |
| 10 a Depreciable assets | 97,911 | | 106,078 | |
| b Less accumulated depreciation | (81,087) | 16,824 | (87,955) | 18,123 |
| 11 Land | | | | • |
| 12 Other assets STMT 5 | | 5,232,041 | | • 6,728,461 |
| 13 Total assets | | 339,251,423 | | 279,901,104 |
| Liabilities and net worth | | | | |
| 14 Accounts payable | | 1,739,699 | | • 937,515 |
| 15 Contributions, gifts, or grants payable | | 5,212,820 | | • 7,811,627 |
| 16 Bonds and notes payable | | | | • |
| 17 Mortgages payable | | | | • |
| 18 Other liabilities | | | | |
| 19 Capital stock or principal fund | | | | • |
| 20 Paid-in or capital surplus. Attach reconciliation | | | | • |
| 21 Retained earnings or income fund | | 332,298,904 | | • 271,151,962 |
| 22 Total liabilities and net worth | | 339,251,423 | | 279,901,104 |

| Schedule M-1 Reconciliation of income per books with income per return | | | |
|--|---------------|--|-------------|
| Do not complete this schedule if the amount on Schedule L, line 13, column (d), is less than \$50,000. | | | |
| 1 Net income per books | • -27,164,598 | 7 Income recorded on books this year not included in this return. Attach schedule | • |
| 2 Federal income tax | • | 8 Deductions in this return not charged against book income this year. Attach schedule | • |
| 3 Excess of capital losses over capital gains | • | 9 Total. Add line 7 and line 8 | |
| 4 Income not recorded on books this year. Attach schedule | • | 10 Net income per return. Subtract line 9 from line 6 | -27,164,598 |
| 5 Expenses recorded on books this year not deducted in this return. Attach schedule | • | | |
| 6 Total. Add line 1 through line 5 | -27,164,598 | | |

CA 199 GROSS AMOUNT FROM SALE OF INVESTMENT PROPERTY STATEMENT 1

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
|-------------------------------|---------------|-----------|-----------------|---------------------|---------|-----------------|-------------------|
| BLACKSTONE RE PARTNERS V.TE.2 | | | PURCHASED | 66,504. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
|--------------------------------|---------------|-----------|-----------------|---------------------|---------|-----------------|-------------------|
| BLACKSTONE RE PARTNERS VI.TE.2 | | | PURCHASED | -1,261. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
|-----------------------------------|---------------|-----------|-----------------|---------------------|---------|-----------------|-------------------|
| BLACKSTONE RE PARTNERS VI.TE.2-NQ | | | PURCHASED | -666. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
|----------------------------|---------------|-----------|-----------------|---------------------|---------|-----------------|-------------------|
| BLACKSTONE RE PARTNERS X.F | | | PURCHASED | -16. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
|--------------------|---------------|-----------|-----------------|---------------------|---------|-----------------|-------------------|
| BREP VII.F (AV-LH) | | | PURCHASED | -480. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|----------------------|---------------------|-----------|-----------------|-------------------|
| BREP VII.F (AV-LH.4) | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | -1,742. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|-------------------------|---------------------|-----------|-----------------|-------------------|
| BREP VII.F-NQ (AV-LH.3) | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | -78,346. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|-------------------------|---------------------|-----------|-----------------|-------------------|
| BREP VII.F-NQ (AV-LH.4) | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | -637,900. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|-------------|---------------------|-----------|-----------------|-------------------|
| BREP VIII.F | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | -806. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|---------------------|---------------------|-----------|-----------------|-------------------|
| BREP VIII.F (AV-LH) | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | -4,908. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|-----------------------|---------------------|-----------|-----------------|-------------------|
| BREP VIII.F (AV-LH.3) | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | -546. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|-----------------------|---------------------|-----------|-----------------|-------------------|
| BREP VIII.F (AV-LH.4) | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | -34,674. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|------------------------|---------------------|-----------|-----------------|-------------------|
| BREP VIII.F-NQ (AV-LH) | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 26. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|--------------------------|---------------------|-----------|-----------------|-------------------|
| BREP VIII.F-NQ (AV-LH.2) | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | -969. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|--------------------------|---------------------|-----------|-----------------|-------------------|
| BREP VIII.F-NQ (AV-LH.3) | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 815. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|--------------------------|---------------------|-----------|-----------------|-------------------|
| BREP VIII.F-NQ (AV-LH.4) | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | -5,167. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|------------------------------------|---------------------|-----------|-----------------|-------------------|
| FPA APARTMENT OPPORTUNITY FUND V-A | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | -13,024. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|-----------------------------|----------------------------|------------------|------------------------|
| MAXIMUM PRIVATE GROWTH FUND | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | <u>GROSS SALES PRICE</u> | | |
| | -147,369. | 0. | 0. |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|---|----------------------------|------------------|------------------------|
| SCULPTOR REAL ESTATE PARALLEL FUND III A | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | <u>GROSS SALES PRICE</u> | | |
| | -104,703. | 0. | 0. |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|-----------------------------|----------------------------|------------------|------------------------|
| SQUARE MILE PARTNERS III TE | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | <u>GROSS SALES PRICE</u> | | |
| | -31,578. | 0. | 0. |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|--------------------|----------------------------|------------------|------------------------|
| TRIDENT V LP | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | <u>GROSS SALES PRICE</u> | | |
| | -232. | 0. | 0. |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|---|----------------------------|------------------|------------------------|
| ACADIAN EMERGING MARKETS SMALL CAP EQUITY FUND | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | <u>GROSS SALES PRICE</u> | | |
| | 0. | 0. | 0. |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|-------------------------|----------------------------|------------------|------------------------|--------------------------|
| AETHER REAL ASSETS I LP | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|--------------------|----------------------------|------------------|------------------------|--------------------------|
| AIO V AIV LP | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|-------------------------------|----------------------------|------------------|------------------------|--------------------------|
| BLACKSTONE RE PARTNERS V.TE.2 | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|--------------------------------|----------------------------|------------------|------------------------|--------------------------|
| BLACKSTONE RE PARTNERS VI.TE.2 | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|-----------------------------------|----------------------------|------------------|------------------------|--------------------------|
| BLACKSTONE RE PARTNERS VI.TE.2-NQ | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|----------------------------|----------------------------|------------------|------------------------|--------------------------|
| BLACKSTONE RE PARTNERS X.F | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|--------------------|----------------------------|------------------|--------------------------|
| BREP VII.F | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | 0. | 0. | 0. |
| | | | <u>GROSS SALES PRICE</u> |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|----------------------|----------------------------|------------------|--------------------------|
| BREP VII.F (AV-LH.4) | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | 0. | 0. | 0. |
| | | | <u>GROSS SALES PRICE</u> |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|-------------------------|----------------------------|------------------|--------------------------|
| BREP VII.F-NQ (AV-LH.3) | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | 0. | 0. | 0. |
| | | | <u>GROSS SALES PRICE</u> |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|--------------------|----------------------------|------------------|--------------------------|
| BREP VIII.F | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | 0. | 0. | 0. |
| | | | <u>GROSS SALES PRICE</u> |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|------------------------|----------------------------|------------------|--------------------------|
| BREP VIII.F (AIV REIT) | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | 0. | 0. | 0. |
| | | | <u>GROSS SALES PRICE</u> |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|---------------------|----------------------------|------------------|--------------------------|
| BREP VIII.F (AV-LH) | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | 0. | 0. | 0. |
| | | | <u>GROSS SALES PRICE</u> |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|-----------------------|----------------------------|------------------|--------------------------|
| BREP VIII.F (AV-LH.2) | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | 0. | 0. | 0. |
| | | | <u>GROSS SALES PRICE</u> |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|-----------------------|----------------------------|------------------|--------------------------|
| BREP VIII.F (AV-LH.3) | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | 0. | 0. | 0. |
| | | | <u>GROSS SALES PRICE</u> |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|-----------------------|----------------------------|------------------|--------------------------|
| BREP VIII.F (AV-LH.4) | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | 0. | 0. | 0. |
| | | | <u>GROSS SALES PRICE</u> |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|--------------------------|----------------------------|------------------|--------------------------|
| BREP VIII.F-NQ (AV-LH.2) | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | 0. | 0. | 0. |
| | | | <u>GROSS SALES PRICE</u> |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|--------------------------|----------------------------|------------------|--------------------------|
| BREP VIII.F-NQ (AV-LH.4) | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | 0. | 0. | 0. |
| | | | <u>GROSS SALES PRICE</u> |
| | | | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> |
|--------------------------|----------------------------|------------------|--------------------------|
| DETROIT VENTURE PARTNERS | | | PURCHASED |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> |
| | 0. | 0. | 0. |
| | | | <u>GROSS SALES PRICE</u> |
| | | | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|----------------------------|---------------------|-----------|-----------------|-------------------|
| ENERGY CAPITAL TE-L DIRECT | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 0. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|------------------------------|---------------------|-----------|-----------------|-------------------|
| ENERGY CAPITAL TE-L INDIRECT | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 0. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|--|---------------------|-----------|-----------------|-------------------|
| FORTRESS CREDIT OPPORTUNITIES FUND (B) | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 0. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|------------------------------------|---------------------|-----------|-----------------|-------------------|
| FPA APARTMENT OPPORTUNITY FUND V-A | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 0. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|-------------------------------------|---------------------|-----------|-----------------|-------------------|
| FPA APARTMENT OPPORTUNITY FUND VI A | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 0. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|--------------------------------------|---------------------|-----------|-----------------|-------------------|
| FPA APARTMENT OPPORTUNITY FUND VII-A | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|--------------------|----------------------------|------------------|------------------------|--------------------------|
| ILLUMEN CAPITAL II | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|---------------------------------|----------------------------|------------------|------------------------|--------------------------|
| KINDERHOOK CAPITAL FUND IV-B LP | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|-----------------------------|----------------------------|------------------|------------------------|--------------------------|
| MAXIMUM PRIVATE GROWTH FUND | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|---|----------------------------|------------------|------------------------|--------------------------|
| METROPOLITAN RE PARTNERS INTERNATIONAL IV | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|---------------------------|----------------------------|------------------|------------------------|--------------------------|
| NEW MOUNTAIN PARTNERS III | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|--------------------|----------------------------|------------------|------------------------|--------------------------|
| PRAIRIE CAPITAL V | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|---|--------------------------------|------------------|----------------------------|------------------------------|
| SCULPTOR REAL ESTATE PARALLEL FUND III A | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|-----------------------|--------------------------------|------------------|----------------------------|------------------------------|
| TFG HEDGE FUND II LLC | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|---------------------|--------------------------------|------------------|----------------------------|------------------------------|
| TFG WAKKR 2012 FUND | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|----------------------------|--------------------------------|------------------|----------------------------|------------------------------|
| THOMA BRAVO FUND XIII-A LP | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|--------------------|--------------------------------|------------------|----------------------------|------------------------------|
| TRIDENT V LP | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|---|--------------------------------|----------------------|----------------------------|------------------------------|
| ACADIAN EMERGING MARKETS SMALL CAP EQUITY FUND | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|-------------------------|--------------------------------|----------------------|----------------------------|------------------------------|
| AETHER REAL ASSETS I LP | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|--------------------|--------------------------------|----------------------|----------------------------|------------------------------|
| AIO V AIV LP | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|-----------------------|--------------------------------|----------------------|----------------------------|------------------------------|
| BREP VIII.F (AV-LH.2) | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|--|--------------------------------|----------------------|----------------------------|------------------------------|
| FORTRESS CREDIT OPPORTUNITIES FUND (B) | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| <u>DESCRIPTION</u> | <u>DATE ACQUIRED</u> | <u>DATE SOLD</u> | <u>METHOD ACQUIRED</u> | |
|--------------------|--------------------------------|----------------------|----------------------------|------------------------------|
| ILLUMEN CAPITAL II | | | PURCHASED | |
| | <u>COST OR OTHER BASIS</u> | <u>DEPREC.</u> | <u>EXPENSE OF SALE</u> | <u>GROSS SALES PRICE</u> |
| | 0. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|-----------------------------|---------------------|-----------|-----------------|-------------------|
| MAXIMUM PRIVATE GROWTH FUND | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 0. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|---------------------|---------------------|-----------|-----------------|-------------------|
| TFG WAKKR 2012 FUND | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 0. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|---------------------|---------------------|-----------|-----------------|-------------------|
| THOMA BRAVO XV-A LP | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 0. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|--------------|---------------------|-----------|-----------------|-------------------|
| TRIDENT V LP | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 0. | 0. | 0. | 0. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|-----------------------------------|---------------------|-----------|-----------------|-------------------|
| MELLON PUBLICLY TRADED SECURITIES | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 118,380,696. | 0. | 0. | 109,789,612. |

| DESCRIPTION | DATE ACQUIRED | DATE SOLD | METHOD ACQUIRED | |
|-----------------------------|---------------------|-----------|-----------------|-------------------|
| SQUARE MILE PARTNERS III TE | | | PURCHASED | |
| | COST OR OTHER BASIS | DEPREC. | EXPENSE OF SALE | GROSS SALES PRICE |
| | 0. | 0. | 0. | 0. |

MAX M. & MARJORIE S. FISHER FOUNDATION,

38-1784340

TOTAL ON FORM 199, PG 2, LINE 6

117,383,654.

0.

0.

109,789,612.

CA 199 COMPENSATION OF OFFICERS, DIRECTORS AND TRUSTEES STATEMENT 2

| NAME AND ADDRESS | TITLE AND AVERAGE HRS WORKED/WK | COMPENSATION |
|--|------------------------------------|--------------|
| JULIE FISHER CUMMINGS TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | TRUSTEE 1.00 | 0. |
| PHILLIP WM. FISHER TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | MANAGING TRUSTEE 1.00 | 0. |
| DR. MARJORIE M. FISHER TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | TREASURER 1.00 | 0. |
| JANE F. SHERMAN TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | TRUSTEE 1.00 | 0. |
| DAVID SHERMAN TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | NEXT GEN TRUSTEE 1.00 | 0. |
| CAROLINE RAFFERTY TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | NEXT GEN TRUSTEE 1.00 | 0. |
| AMANDA FISHER TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | NEXT GEN TRUSTEE 1.00 | 0. |
| ALISSANDRA ARONOW TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | NEXT GEN TRUSTEE 1.00 | 0. |
| ANDREW SHERMAN TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | NEXT GEN TRUSTEE 1.00 | 0. |
| DOUGLAS BITONTI STEWART TWO TOWNE SQUARE, SUITE 900 SOUTHFIELD, MI 48076 | EXECUTIVE DIRECTOR 40.00 | 448,049. |

TOTAL TO FORM 199, PART II, LINE 11

448,049.

CA 199

OTHER EXPENSES

STATEMENT 3

| DESCRIPTION | AMOUNT |
|-------------------------------------|------------|
| PENSION PLANS, EMPLOYEE BENEFITS | 427,227. |
| LEGAL FEES | 90,301. |
| ACCOUNTING FEES | 81,775. |
| OTHER PROFESSIONAL FEES | 3,841,855. |
| TRAVEL, CONFERENCES, AND MEETINGS | 103,235. |
| PRINTING AND PUBLICATIONS | 10,136. |
| EMPLOYEE TRAINING | 42,014. |
| MISCELLANEOUS EXPENSES | 23,699. |
| TELEPHONE EXPENSE | 9,075. |
| POSTAGE | 2,297. |
| INFORMATION SYSTEMS | 22,496. |
| GRANT TRACKING SOFTWARE | 39,543. |
| CONTRIBUTION SPONSORSHIPS EXPENSE | 17,033. |
| OTHER DEDUCTIONS FROM K-1'S | 7. |
| TAX OFFSET PY OVERPAYMENTS | -804,825. |
| TOTAL TO FORM 199, PART II, LINE 17 | 3,905,868. |

CA 199

OTHER INVESTMENTS

STATEMENT 4

| DESCRIPTION | BEG. OF YEAR | END OF YEAR |
|---|--------------|-------------|
| 11,974.349 SHS TFG HEDGE FUND II (FISHER FAIRWAY MASTER FUND LTD) | 13,811,722. | 1,734,814. |
| 29,374.107 SHS TFG ARTEMIS VIII 2013 FUND LLC | 4,484,861. | 2,073,040. |
| 21,944.706 SHS TFG EC III 2014 FUND LLC | 3,220,123. | 1,406,813. |
| 41,098.401 SHS TFG ARA III 2013 FUND | 3,102,296. | 2,927,038. |
| 3,829.517 SHS TFG WAKKR 2012 FUND LLC | 2,469,979. | 568,321. |
| 12,537.425 SHS TFG VISTA 2014 FUND LLC | 4,642,420. | 3,714,120. |
| 19,193.358 SHS TFG VISTA VI 2016 FUND | 5,486,704. | 4,138,264. |
| 3,117,695.530 SHS ANCHORAGE ILLIQUID OPPORTUNITIES OFFSHORE V | 3,069,343. | 1,482,685. |
| 1,922,890.570 SHS KINDERHOOK CAPITAL FUND IV-B | 1,985,098. | 1,530,296. |
| 3,063.135 SHS TFG PAM III | 3,061,534. | 1,340,940. |
| 9,526.031 TFG TRIDENT VI 2014 FUND LLC | 2,963,745. | 2,351,223. |
| 1,734.720 SHS TFG MAGNETITE 2014 FUND LLC | 656,202. | 497,817. |
| 13,533.642 SHS TFG ENERGY RIDGE 2013 FUND | 1,702,205. | 1,582,754. |
| 1,199,807.800 SHS BLACKSTONE REAL ESTATE PARTNERS VII F | 1,238,326. | 517,770. |
| 1,501,210.710 SHS THIRD & GRAND INVESTORS | 12,923,769. | 0. |
| 17,336.033 SHS TFG RAM IV 2015 FUND | 3,180,939. | 288,274. |
| 1,059,778.000 SHS GSO ENERGY SELECT OPPORTUNITIES FEEDER FUND | 1,079,327. | 455,233. |
| 1,633,507.120 SHS BLACKSTONE REAL ESTATE PARTNERS VIII | 1,851,702. | 1,554,868. |
| 2,774.272 SHS TFG NEWVEST SECONDARIES 2013 FUND | 1,321,001. | 599,097. |
| 9,845.499 SHS TFG TRIEUROPROP 2013 FUND LLC | 881,138. | 720,636. |
| 1,319,437.340 SHS TRIDENT V LP | 1,397,551. | 1,286,898. |
| 16,804.101 SHS TFG AXIOS IV 2015 FUND | 3,209,993. | 2,297,197. |
| 11,708.429 SHS TFG TRI EURO 2015 FUND 4 LLC | 1,781,411. | 1,533,677. |

| <u>MAX M. & MARJORIE S. FISHER FOUNDATION,</u> | | <u>38-1784340</u> |
|---|-------------|-------------------|
| 222.670 SHS TFG EXETER III 2013 FUND LLC | 1,311,845. | 143,972. |
| 57,006.870 FPA APARTMENT OPPORTUNITY FUND V | 63,530. | 167. |
| 12,873.260 SHS TFG ARBOR IV 2015 FUND | 2,922,661. | 1,181,047. |
| 1,076,936.000 SHS STRATEGIC VALUE SPECIAL SITUATION FEEDER FUND II LP | 1,093,913. | 805,221. |
| 973,543.180 SHS PRAIRIE CAPITAL V | 1,014,970. | 892,643. |
| 13,160.591 TFG EXETER IV 2017 FUND | 2,951,276. | 295,665. |
| 2,178,840.380 SHS FPA APARTMENT OPPORTUNITY FUND VI | 2,141,317. | 927,334. |
| 624,459.620 SHS METROPOLITAN REAL ESTATE PARTNERS INT IV LP | 617,088. | 448,371. |
| 8,544.000 SHS NEW MOUNTAIN PARTNERS III | 21,242. | 50,517. |
| 497,350.000 SHS AETHER INVESTEMENT PARTNERS | 509,629. | 16,232. |
| 9,516.279 SHS TFG 2011 ARA II FUND LLC | 612,202. | 468,538. |
| 29,799.783 SHS TFG ENERGY RIDGE III 2015 FUND | 2,123,882. | 2,587,515. |
| 303,821.050 SHS FORTRESS CREDIT OPPS FUND B LP | 283,076. | 62,336. |
| 11,754.515 TFG KINDER V 2017 FUND | 2,829,903. | 2,370,262. |
| 10,267.120 SHS TFG 2012 EC MEZZ FUND | 638,351. | 221,620. |
| 924.881 SHS TFG MGRE FUND 2013 LLC | 161,507. | 99,553. |
| 815.712 SHS TFG ARTEMIS FUND LLC | 529,588. | 69,907. |
| 10,430.807 SHS TFG RAISED CITY 2018 FUND | 774,326. | 617,122. |
| 510,382.730 SHS TFG RAM RE FUND LLC | 566,783. | 358,671. |
| 345,545.000 SHS SCULPTOR REAL ESTATE FUND III | 365,008. | 313,089. |
| 13,892.131 SHS TFG ELAB II 2017 FUND | 2,325,210. | 1,993,951. |
| 90,831.650 SHS BLACKSTONE VI | 94,551. | 57,328. |
| 625,805.000 SHS DETROIT VENTURE PARTNERS LP | 628,751. | 506,088. |
| 31,415.005 SHS TFG HURON 2016 FUND | 1,825,649. | 1,794,029. |
| 101,311.520 SHS BLACKSTONE REAL ESTATE PARTNERS V TE 2 LP | 103,560. | 3,482. |
| 24,347.000 SHS ENERGY CAPITAL TE-L INDIRECT | 23,118. | 0. |
| 30,499.919 SHS TFG AXIOS V 2018 FUND | 4,455,522. | 4,437,169. |
| 109,146.720 SHS METROPOLITAN REAL ESTATE PARTNERS INT II | 101,464. | 35,588. |
| 3,302.315 SHS TFG RAM V 2018 FUND | 574,901. | 696,482. |
| 91,472.000 SHS ENERGY CAPITAL TE-L DIRECT | 85,222. | 0. |
| 11.286 SHS TFG EXETER INDUSTRIAL VALUE FUND II LP | 67,746. | 11,475. |
| 6,741 SHS SQUARE MILE PARTNERS III LP | 13,812. | 0. |
| 20,914.162 SHS TFG EUROPEAN RE FUND LLC | 21,532. | 18,167. |
| 1,508,320.780 SHS FPA APARTMENT OPPORTUNITY FUND VII | 1,540,164. | 2,430,351. |
| 32,541.281 SHS TFG TRI EURO 2018 FUND 5 | 1,366,833. | 1,714,111. |
| 2,911,634.000 SHS GOLDENTREE DISTRESSED FUND III (CAYMAN) | 2,995,545. | 1,855,594. |
| 77,881.629 SHS TFG ARBOR V 2019 FUND | 1,908,166. | 2,031,049. |
| 22,804.901 SHS TFG ARTEMIS IX 2017 FUND | 2,868,652. | 3,746,305. |
| 12,870.685 SHS TFG BAR ASIA VII FUND 2018 | 2,300,916. | 2,202,766. |
| 31,345.086 SHS TFG CHERRY LAKE FUND | 9,318,174. | 8,126,525. |
| 8,924.029 SHS TFG OCEANS IV 2019 FUND | 1,443,070. | 1,792,218. |
| 22,189.751 SHS TFG PONT SK 2019 FUND | 2,754,982. | 3,879,220. |
| 8,554,317.900 SHS THOMA BRAVO FUND XIII | 8,653,688. | 8,780,130. |
| 34,314.195 SHS TFG BRAVO XIV 2020 FUND | 3,442,861. | 3,766,917. |
| 9,848.751 TFG PAM V 2020 FUND | 809,266. | 1,207,233. |
| ILLUMEN CAPITAL II LP | 62,907. | 123,402. |
| 2,791,935.000 SHS NB CREDIT OPP II CAYMAN FEEDER | 2,959,135. | 3,367,010. |
| 107,064.000 SHS PICO VENTURE PARTNERS III | 372,900. | 434,356. |
| 545,643.202 SHS MFS EMERGING MARKTS DEBT-I | 7,901,475. | 10,551,780. |
| 1,621,722.760 SHS NEUBERGER BERMAN HIGH INC BOND | 14,141,421. | 10,209,569. |

| | | |
|---|---------------------|---------------------|
| <u>MAX M. & MARJORIE S. FISHER FOUNDATION,</u> | | <u>38-1784340</u> |
| 5,712,346.330 SHS ACADIAN EMERGING MARKETS SMALL CAP EQUITY FUND | 5,712,345. | 4,987,258. |
| 5,163,475.470 SHS AXIOM EMERGING MARKETS EQUITY FUND | 5,163,474. | 3,561,024. |
| 201,096.000 SHS ISHARES ESG AWARE MSCI USA FDTN TIAA CREF CORE IMPACT BOND | 21,698,257. | 17,042,886. |
| FDTN NB SUSTAINABLE RESEARCH OPPORTUNITIES | 45,492,335. | 39,587,119. |
| FDTN CLARKSTON SMALL CAPITAL QUALITY VALUE | 31,065,649. | 27,346,694. |
| FDTN KAYNE ANDERSON SMALL CAP GROWTH | 6,959,326. | 8,027,495. |
| FDTN NB INTERNATIONAL EQUITY ADR | 5,931,822. | 4,990,350. |
| FDTN WCM INTERNATIONAL FOCUSED GROWTH | 15,657,125. | 7,020,171. |
| NEUBERGER FLOATING RATE | 10,717,757. | 6,057,789. |
| ARTISAN INTERNATIONAL VAL-ADV | 0. | 3,974,913. |
| RAM REALTY PARTNERS VI | 0. | 6,067,973. |
| SIGULER GUFF DISTRESSED OPP FD III | 0. | 85,427. |
| W CAPITAL PARTNERS II | 0. | 0. |
| NB SELECT OPPORTUNITIES FUND V | 0. | 0. |
| ETHOS CAPITAL INVESTMENTS A | 0. | 3,222,636. |
| ALMANAC REALTY SECURITIES IX | 0. | 4,303,612. |
| THOMA BRAVO FUND XV-A | 0. | 1,196,889. |
| IONIC VOLATILITY ARBITRAGE FUND II | 0. | 2,802,680. |
| | | 0. |
| TOTAL TO FORM 199, SCHEDULE L, LINE 9 | <u>324,612,769.</u> | <u>262,578,768.</u> |

| | | |
|--|---------------------|--------------------|
| <u>CA 199</u> | <u>OTHER ASSETS</u> | <u>STATEMENT 5</u> |
| <u>DESCRIPTION</u> | <u>BEG. OF YEAR</u> | <u>END OF YEAR</u> |
| PREPAID EXPENSES AND DEFERRED CHARGES | 2,949. | 0. |
| PROGRAM-RELATED INVESTMENTS | 5,141,592. | 6,348,951. |
| ARTWORK | 87,500. | 87,500. |
| RIGHT TO USE ASSET NET OF AMORTIZATION | 0. | 292,010. |
| TOTAL TO FORM 199, SCHEDULE L, LINE 12 | <u>5,232,041.</u> | <u>6,728,461.</u> |

**Corporation Depreciation
and Amortization**

Attach to Form 100 or Form 100W.

FORM 199

FEIN 38-1784340

Corporation name

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

California corporation number

8007302

Part I Election To Expense Certain Property Under IRC Section 179

| | | | |
|----|---|------------------------------|------------------|
| 1 | Maximum deduction under IRC Section 179 for California | 1 | \$25,000 |
| 2 | Total cost of IRC Section 179 property placed in service | 2 | |
| 3 | Threshold cost of IRC Section 179 property before reduction in limitation | 3 | \$200,000 |
| 4 | Reduction in limitation. Subtract line 3 from line 2. If zero or less, enter -0- | 4 | |
| 5 | Dollar limitation for taxable year. Subtract line 4 from line 1. If zero or less, enter -0- | 5 | |
| 6 | (a) Description of property | (b) Cost (business use only) | (c) Elected cost |
| 7 | Listed property (elected IRC Section 179 cost) | 7 | |
| 8 | Total elected cost of IRC Section 179 property. Add amounts in column (c), line 6 and line 7 | 8 | |
| 9 | Tentative deduction. Enter the smaller of line 5 or line 8 | 9 | |
| 10 | Carryover of disallowed deduction from prior taxable years | 10 | |
| 11 | Business income limitation. Enter the smaller of business income (not less than zero) or line 5 | 11 | |
| 12 | IRC Section 179 expense deduction. Add line 9 and line 10, but do not enter more than line 11 | 12 | |
| 13 | Carryover of disallowed deduction to 2023. Add line 9 and line 10, less line 12 | 13 | |

Part II Depreciation and Election of Additional First Year Depreciation Deduction Under R&TC Section 24356

| (a) Description of property | (b) Date acquired (mm/dd/yyyy) | (c) Cost or other basis | (d) Depreciation allowed or allowable in earlier years | (e) Depreciation method | (f) Life or rate | (g) Depreciation for this year | (h) Additional first year depreciation |
|--------------------------------|---|-------------------------------|--|-------------------------------|------------------------|--------------------------------------|---|
| 14 | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| SEE STATEMENT | 6 | 106,078. | 81,092. | | | | |
| 15 | Add the amounts in column (g) and column (h). The total of column (h) may not exceed \$2,000. See instructions for line 14, column (h) | | | | | 15 | 6,870 |

Part III Summary

| | | | |
|----|--|----|--------------|
| 16 | Total: If the corporation is electing: IRC Section 179 expense, add the amount on line 12 and line 15, column (g) or Additional first year depreciation under R&TC Section 24356, add the amounts on line 15, columns (g) and (h) or Depreciation (if no election is made), enter the amount from line 15, column (g) | 16 | 6,870 |
| 17 | Total depreciation claimed for federal purposes from federal Form 4562, line 22 | 17 | 6,870 |
| 18 | Depreciation adjustment. If line 17 is greater than line 16, enter the difference here and on Form 100 or Form 100W, Side 1, line 6. If line 17 is less than line 16, enter the difference here and on Form 100 or Form 100W, Side 2, line 12. (If California depreciation amounts are used to determine net income before state adjustments on Form 100 or Form 100W, no adjustment is necessary.) | 18 | 0 |

Part IV Amortization

| (a) Description of property | (b) Date acquired (mm/dd/yyyy) | (c) Cost or other basis | (d) Amortization allowed or allowable in earlier years | (e) R&TC Section (see instructions) | (f) Period or percentage | (g) Amortization for this year | |
|--------------------------------|--|-------------------------------|--|--|--------------------------------|--------------------------------------|--|
| 19 | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| 20 | Total. Add the amounts in column (g) | | | | | 20 | |
| 21 | Total amortization claimed for federal purposes from federal Form 4562, line 44 | | | | | 21 | |
| 22 | Amortization adjustment. If line 21 is greater than line 20, enter the difference here and on Form 100 or Form 100W, Side 1, line 6. If line 21 is less than line 20, enter the difference here and on Form 100 or Form 100W, Side 2, line 12 | | | | | 22 | |

CA 3885

DEPRECIATION

STATEMENT 6

| ASSET NO./ DESCRIPTION | DATE IN SERVICE | COST OR BASIS | PRIOR DEPR | METHOD | LIFE | DEPRE- CIATION | BONUS |
|------------------------------|--------------------|------------------|---------------|--------|------|-------------------|-------|
| 30 COMPUTER | 01/01/09 | 1,968. | 1,970. | SL | 5.00 | 0. | |
| 52 LAPTOP COMPUTER | 06/14/10 | 2,000. | 2,000. | SL | 5.00 | 0. | |
| 63 LAPTOP COMPUTER | 02/16/11 | 2,230. | 2,230. | SL | 5.00 | 0. | |
| 64 LAPTOP COMPUTER | 08/29/11 | 1,970. | 1,970. | SL | 5.00 | 0. | |
| 65 IPADS | 09/09/11 | 1,398. | 1,259. | SL | 5.00 | 0. | |
| 76 COMPUTER | 05/13/09 | 1,011. | 1,150. | SL | 5.00 | 0. | |
| 77 LAPTOP COMPUTER | 06/13/12 | 1,616. | 1,616. | SL | 5.00 | 0. | |
| 79 LAPTOP COMPUTER | 12/14/12 | 2,099. | 2,099. | SL | 5.00 | 0. | |
| 80 LAPTOP COMPUTER | 12/14/12 | 2,115. | 2,115. | SL | 5.00 | 0. | |
| 91 IPADS | 05/17/13 | 905. | 905. | SL | 5.00 | 0. | |
| 92 IPADS | 10/09/13 | 928. | 928. | SL | 5.00 | 0. | |
| 93 CHAIRS | 02/06/13 | 2,386. | 2,379. | SL | 5.00 | 0. | |
| 105 IPAD | 11/13/14 | 881. | 881. | SL | 5.00 | 0. | |
| 106 LAPTOP COMPUTER | 11/13/14 | 1,190. | 1,190. | SL | 5.00 | 0. | |
| 107 OFFICE FURNITURE | 04/01/14 | 25,921. | 25,921. | SL | 7.00 | 0. | |
| 108 PHONES | 04/01/14 | 970. | 970. | SL | 7.00 | 0. | |
| 120 HP ELITEBOOK COMPUTER | 03/16/15 | 1,533. | 1,533. | SL | 5.00 | 0. | |
| 121 HP ELITEBOOK COMPUTER | 11/19/15 | 2,363. | 2,363. | SL | 5.00 | 0. | |
| 122 HP ELITEBOOK COMPUTER | 03/01/16 | 2,555. | 2,555. | SL | 5.00 | 0. | |
| 123 HP ELITEBOOK COMPUTER | 10/14/16 | 2,789. | 2,789. | SL | 5.00 | 0. | |
| 124 HP ELITEBOOK COMPUTER | 12/21/16 | 2,904. | 2,904. | SL | 5.00 | 0. | |
| 125 COMPUTER | 05/19/17 | 2,589. | 2,417. | SL | 5.00 | 172. | |
| 126 HP ELITEBOOK COMPUTER | 02/22/18 | 2,908. | 2,279. | SL | 5.00 | 582. | |
| 127 IPAD | 03/12/18 | 528. | 406. | SL | 5.00 | 106. | |
| 128 MICROSOFT SURFACE LAPTOP | 07/13/18 | 2,744. | 1,921. | SL | 5.00 | 549. | |
| 129 COMPUTER | 08/16/18 | 2,431. | 1,661. | SL | 5.00 | 486. | |
| 130 NBS - OFFICE FURNITURE | 08/23/18 | 10,694. | 5,221. | SL | 7.00 | 1,528. | |

| | | | | | | |
|--------------------|--|-----------------|----------------|----|------|---------------|
| 131 | ADDITIONAL PHONES | | | | | |
| | 09/10/18 | 1,937. | 923. | SL | 7.00 | 277. |
| 133 | MICROSOFT SURFACE PRO 6 | | | | | |
| | 03/22/19 | 2,127. | 1,206. | SL | 5.00 | 425. |
| 134 | HP ELITEBOOK 850 G4 | | | | | |
| | 05/03/19 | 2,101. | 1,121. | SL | 5.00 | 420. |
| 135 | IPAD AND CASE | | | | | |
| | 07/15/19 | 498. | 250. | SL | 5.00 | 100. |
| 136 | MICROSOFT SURFACE PRO 6 | | | | | |
| | 10/23/19 | 2,095. | 943. | SL | 5.00 | 419. |
| 137 | APPLE IPAD WITH ACCESSORIES | | | | | |
| | 09/24/20 | 658. | 176. | SL | 5.00 | 132. |
| 138 | HP 450 LAPTOP FOR KENYA AND CAMARRAH | | | | | |
| | 12/31/20 | 2,613. | 567. | SL | 5.00 | 523. |
| 139 | HP 450 LAPTOP FOR ADMINISTRATIVE ASSISTANT | | | | | |
| | 03/22/21 | 1,573. | 263. | SL | 5.00 | 315. |
| 140 | DOCKING STATION FOR HP LAPTOP | | | | | |
| | 12/31/21 | 683. | 11. | SL | 5.00 | 137. |
| 141 | HP 450 LAPTOP-ERICKSON (TEMP E.A.) | | | | | |
| | 02/28/22 | 1,641. | | SL | 5.00 | 301. |
| 142 | 10.2-INCH IPAD WI-FI 64 GB SPACE GRAY W/ KEYBOARD CASE | | | | | |
| | 07/19/22 | 508. | | SL | 5.00 | 51. |
| 143 | HP PROBOOK 450GB 15" LAPTOP (CONNOR) | | | | | |
| | 08/28/22 | 1,475. | | SL | 5.00 | 123. |
| 144 | MICROSOFT SURFACE PRO 7+ (ROWELL) | | | | | |
| | 09/20/22 | 2,182. | | SL | 5.00 | 145. |
| 145 | NEW HP LAPTOP (TAPERT) | | | | | |
| | 11/23/22 | 1,641. | | SL | 5.00 | 55. |
| 146 | DOCKING STATIONS (3) FOR HP LAPTOP (TAPERT) | | | | | |
| | 11/23/22 | 720. | | SL | 5.00 | 24. |
| TOTAL TO FORM 3885 | | <u>106,078.</u> | <u>81,092.</u> | | | <u>6,870.</u> |

TAX RETURN FILING INSTRUCTIONS

CALIFORNIA FORM 109

FOR THE YEAR ENDING

DECEMBER 31, 2022

PREPARED FOR:

MS. EMILY DIEGEL
MAX M. & MARJORIE S. FISHER FOUNDATION
TWO TOWNE SQUARE 900
SOUTHFIELD, MI 48076

PREPARED BY:

PLANTE & MORAN, PLLC
2601 CAMBRIDGE CT., STE. 300
AUBURN HILLS, MI 48326

TO BE SIGNED AND DATED BY:

THE AUTHORIZED INDIVIDUAL(S).

AMOUNT OF TAX:

| | | |
|------------------------------|----|--------|
| TOTAL TAX | \$ | 3,943 |
| LESS: PAYMENTS AND CREDITS | \$ | 10,705 |
| PLUS: OTHER AMOUNT | | 0 |
| PLUS: INTEREST AND PENALTIES | \$ | 0 |
| OVERPAYMENT | \$ | 6,762 |

OVERPAYMENT:

| | | |
|--------------------------------|----|-------|
| CREDITED TO YOUR ESTIMATED TAX | \$ | 6,762 |
| OTHER AMOUNT | \$ | 0 |
| REFUNDED TO YOU | \$ | 0 |

MAKE CHECK PAYABLE TO:

NOT APPLICABLE

MAIL TAX RETURN AND CHECK (IF APPLICABLE) TO:

FRANCHISE TAX BOARD
P.O. BOX 942857
SACRAMENTO, CA 94257-0500

RETURN MUST BE MAILED ON OR BEFORE:

NOVEMBER 15, 2023

SPECIAL INSTRUCTIONS:

REQUIRED ATTACHMENTS FROM THE FEDERAL RETURN, FORM 990-T, HAVE BEEN ATTACHED TO THE FILING COPY OF THIS RETURN.

California Exempt Organization Business Income Tax Return

Calendar Year 2022 or fiscal year beginning (mm/dd/yyyy) , and ending (mm/dd/yyyy)

Corporation/Organization name MAX M. & MARJORIE S. FISHER FOUNDATION, INC. California corporation number 8007302

Additional information. See instructions. FEIN 38-1784340

Street address (suite/room no.) TWO TOWNE SQUARE, NO. 900 PMB no.

City (If the corporation has a foreign address, see instructions.) SOUTHFIELD State MI ZIP code 48076

Foreign country name Foreign province/state/county Foreign postal code

- A First return filed? B Is this an education IRA... C Is the organization under audit... D Final return? E Amended return? F Accounting method used... G Nature of trade or business PARTNERSHIP INCOME H Is the organization a non-exempt charitable trust... I Is this organization claiming any former... J Is this organization a qualified pension... K Unrelated Business Activity (UBA) code 211100 L Is this a hospital?

Table with 25 rows and 3 columns: Description, Amount, and Code. Rows include Taxable Corporation, Taxable Trust, Tax Computation, Total Tax, Payments, and Use Tax/Overpayment.

| | | | | |
|--|---|-------|--|----|
| Refund or Amount Due | 26 Refund. If line 25 is less than line 24, then subtract line 25 from line 24 | • 26 | | 00 |
| | a Fill in the account information to have the refund directly deposited. Routing number | • 26a | | |
| | b Type: Checking <input type="checkbox"/> Savings <input type="checkbox"/> c Account Number | • 26c | | |
| | 27 Penalties and interest. See General Information M | • 27 | | 00 |
| 28 <input type="checkbox"/> Check if estimate penalty computed using Exception B or C and attach form FTB 5806 | | | | |
| 29 Total amount due. Add line 22, line 23, line 25, and line 27, then subtract line 24 | • 29 | | | 00 |

Unrelated Business Taxable Income

Part I Unrelated Trade or Business Income

| | | | | | |
|---|-------------------------------|-----------|------|--------|----|
| 1 a Gross receipts or gross sales | b Less returns and allowances | c Balance | • 1c | | 00 |
| 2 Cost of goods sold and/or operations (Schedule A, line 7) | | | • 2 | | 00 |
| 3 Gross profit. Subtract line 2 from line 1c | | | • 3 | | 00 |
| 4 a Capital gain net income. See Specific Line Instructions - Trusts attach Schedule D (541) | | | • 4a | 52,998 | 00 |
| b Net gain (loss) from Part II, Schedule D-1 | | | • 4b | | 00 |
| c Capital loss deduction for trusts | | | • 4c | | 00 |
| 5 Income (or loss) from partnerships, limited liability companies, or S corporations. See Specific Line Instructions. Attach Schedule K-1 (565, 568, or 100S) or similar schedule | | | • 5 | -7,396 | 00 |
| 6 Rental income (Schedule C) | | | • 6 | | 00 |
| 7 Unrelated debt-financed income (Schedule D) | | | • 7 | | 00 |
| 8 Investment income of an R&TC Section 23701g, 23701i, or 23701n organization (Schedule E) | | | • 8 | | 00 |
| 9 Interest, Annuities, Royalties and Rents from controlled organizations (Schedule F) | | | • 9 | | 00 |
| 10 Exploited exempt activity income (Schedule G) | | | • 10 | | 00 |
| 11 Advertising income (Schedule H, Part III, Column A) | | | • 11 | | 00 |
| 12 Other income. Attach schedule | | | • 12 | | 00 |
| 13 Total unrelated trade or business income. Add line 3 through line 12 | | | • 13 | 45,602 | 00 |

Part II Deductions Not Taken Elsewhere (Except for contributions, deductions must be directly connected with the unrelated business income.)

| | | | |
|---|-------|--------|----|
| 14 Compensation of officers, directors, and trustees from Schedule I | • 14 | | 00 |
| 15 Salaries and wages | • 15 | | 00 |
| 16 Repairs | • 16 | | 00 |
| 17 Bad debts | • 17 | | 00 |
| 18 Interest. Attach schedule | • 18 | | 00 |
| 19 Taxes. Attach schedule | • 19 | | 00 |
| 20 Contributions. See instructions and attach schedule | • 20 | | 00 |
| 21 a Depreciation (Corporations and Associations - Schedule J) (Trusts - form FTB 3885F) | • 21a | | 00 |
| b Less: depreciation claimed on Schedule A. See instructions | • 21b | | 00 |
| 22 Depletion. Attach schedule | • 22 | | 00 |
| 23 a Contributions to deferred compensation plans | • 23a | | 00 |
| b Employee benefit programs. See instructions | • 23b | | 00 |
| 24 Other deductions. Attach schedule | • 24 | | 00 |
| 25 Total deductions. Add line 14 through line 24 | • 25 | | 00 |
| 26 Unrelated business taxable income before allowable excess advertising costs. Subtract line 25 from line 13 | • 26 | 45,602 | 00 |
| 27 Excess advertising costs (Schedule H, Part III, Column B) | • 27 | | 00 |
| 28 Unrelated business taxable income before specific deduction. Subtract line 27 from line 26 | • 28 | 45,602 | 00 |
| 29 Specific deduction. See instructions | • 29 | 1,000 | 00 |
| 30 Unrelated business taxable income. Subtract line 29 from line 28. If line 28 is a loss, enter line 28 | • 30 | 44,602 | 00 |

Our privacy notice can be found in annual tax booklets or online. Go to ftb.ca.gov/privacy to learn about our privacy policy statement, or go to ftb.ca.gov/forms and search for 1131 to locate FTB 1131 EN-SP, Franchise Tax Board Privacy Notice on Collection. To request this notice by mail, call 800.338.0505 and enter form code 948 when instructed.

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 taxpayer) is based on all information of which preparer has any knowledge.

| | | | | |
|---|--|------------------------------------|---|---|
| Sign Here | Signature of officer | Title EXECUTIVE DIRECTOR | Date | • Telephone 248-415-1444 |
| | Preparer's signature | Date | Check if self-employed <input type="checkbox"/> | • PTIN P00645252 |
| Paid Preparer's Use Only | Firm's name (or yours, if self-employed) and address | | | • Firm's FEIN 38-1357951 |
| | | | | • Telephone (248) 375-7100 |
| May the FTB discuss this return with the preparer shown above? See instructions | | | | • <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

Schedule A Cost of Goods Sold and/or Operations.

Method of inventory valuation (specify)

N/A

| | | | |
|-----|---|----|----|
| 1 | Inventory at beginning of year | 1 | 00 |
| 2 | Purchases | 2 | 00 |
| 3 | Cost of labor | 3 | 00 |
| 4 a | Additional IRC Section 263A costs. Attach schedule | 4a | 00 |
| b | Other costs. Attach schedule | 4b | 00 |
| 5 | Total. Add line 1 through line 4b | 5 | 00 |
| 6 | Inventory at end of year | 6 | 00 |
| 7 | Cost of goods sold and/or operations. Subtract line 6 from line 5. Enter here and on Side 2, Part I, line 2 | 7 | 00 |

Do the rules of IRC Section 263A (with respect to property produced or acquired for resale) apply to this organization? Yes No

Schedule B Tax Credits.

| | | | | | |
|---|--|------|---|----|----|
| 1 | Enter credit name | code | 1 | 00 | |
| 2 | Enter credit name | code | 2 | 00 | |
| 3 | Enter credit name | code | 3 | 00 | |
| 4 | Total. Add line 1 through line 3. If claiming more than 3 credits, enter the total of all claimed credits on line 4. Enter here and on Side 1, line 11 | | | 4 | 00 |

Schedule K Add-On Taxes or Recapture of Tax. See instructions.

| | | | |
|---|---|----|----|
| 1 | Interest computation under the look-back method for completed long-term contracts. Attach form FTB 3834 | 1 | 00 |
| 2 | Interest on tax attributable to installment: a Sales of certain timeshares or residential lots | 2a | 00 |
| | b Method for non-dealer installment obligations | 2b | 00 |
| 3 | IRC Section 197(f)(9)(B)(ii) election to recognize gain on the disposition of intangibles | 3 | 00 |
| 4 | Credit recapture. Credit name | 4 | 00 |
| 5 | Total. Combine the amounts on line 1 through line 4. See instructions | 5 | 00 |

Schedule R Apportionment Formula Worksheet. Use only for unrelated trade or business amounts.

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

| | (a) Total within and outside California | (b) Total within California | (c) Percent within California [(b) ÷ (a)] x 100 |
|--|---|-----------------------------------|---|
| 1 Total sales | • | • | |
| 2 Apportionment percentage. Divide total sales column (b) by total sales column (a) and multiply the result by 100. Enter the result here and on Form 109, Side 1, line 2. | | | • |

Part B. Three Factor Formula. Complete this part only if the corporation uses the three-factor formula.

| | (a) Total within and outside California | (b) Total within California | (c) Percent within California [(b) ÷ (a)] x 100 |
|---|---|-----------------------------------|---|
| 1 Property factor: See instructions | • | • | • |
| 2 Payroll factor: Wages and other compensation of employees | • | • | • |
| 3 Sales factor: Gross sales and/or receipts less returns and allowances | • | • | • |
| 4 Total percentage: Add the percentages in column (c) | | | |
| 5 Average apportionment percentage: Divide the factor on line 4 by 3 and enter the result here and on Form 109, Side 1, line 2. See instructions for exceptions | | | • |

Schedule C Rental Income from Real Property and Personal Property Leased with Real Property

For rental income from debt-financed property, use Schedule D, R&TC Section 23701g, Section 23701i, and Section 23701n organizations. See instructions for exceptions.

| | | |
|---|--|--|
| 1 Description of property | 2 Rent received or accrued | 3 Percentage of rent attributable to personal property |
| | | % |
| | | % |
| | | % |
| 4 Complete if any item in column 3 is more than 50%, or for any item if the rent is determined on the basis of profit or income | | 5 Complete if any item in column 3 is more than 10%, but not more than 50% |
| (a) Deductions directly connected | (b) Income includible, column 2 less column 4(a) | (a) Gross income reportable, column 2 x column 3 |
| | | (b) Deductions directly connected with personal property (attach schedule) |
| | | (c) Net income includible, column 5(a) less column 5(b) |
| | | |

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

Schedule D Unrelated Debt-Financed Income

| 1 Description of debt-financed property | | | 2 Gross income from or allocable to debt-financed property | 3 Deductions directly connected with or allocable to debt-financed property | |
|--|--|--|--|---|---|
| | | | | (a) Straight-line depreciation (attach schedule) | (b) Other deductions (attach schedule) |
| a | • | | • | • | • |
| b | • | | • | • | • |
| c | • | | • | • | • |
| 4 Amount of average acquisition indebtedness on or allocable to debt-financed property (attach schedule) | 5 Average adjusted basis of or allocable to debt-financed property (attach schedule) | 6 Debt basis percentage, column 4 ÷ column 5 | 7 Gross income reportable, column 2 x column 6 | 8 Allocable deductions, total of columns 3(a) and 3(b) x column 6 | 9 Net income (or loss) includible, column 7 less column 8 |
| a | • | • % | • | • | • |
| b | • | • % | • | • | • |
| c | • | • % | • | • | • |
| Total. Enter here and on Side 2, Part I, line 7 | | | | | • |

Schedule E Investment Income of an R&TC Section 23701g, Section 23701i, or Section 23701n Organization

| 1 Description | 2 Amount | 3 Deductions directly connected | 4 Net investment income, column 2 less column 3 | 5 Set-asides | 6 Balance of investment income, column 4 less column 5 |
|---|----------|---------------------------------|---|--------------|--|
| | | | | | |
| Total. Enter here and on Side 2, Part I, line 8 | | | | | |
| Enter gross income from members (dues, fees, charges, or similar amounts) | | | | | |

Schedule F Interest, Annuities, Royalties and Rents from Controlled Organizations

| Exempt Controlled Organizations | | | | | |
|---|----------------------------------|------------------------------------|---|--|---|
| 1 Name of controlled organizations | 2 Employer identification number | 3 Net unrelated income (loss) | 4 Total of specified payments made | 5 Part of column (4) that is included in the controlling organization's gross income | 6 Deductions directly connected with income in column (5) |
| 1 | | | | | |
| 2 | | | | | |
| 3 | | | | | |
| Nonexempt Controlled Organizations | | | | | |
| 7 Taxable income | 8 Net unrelated income (loss) | 9 Total of specified payments made | 10 Part of column (9) that is included in the controlling organization's gross income | 11 Deductions directly connected with income in column (10) | |
| 1 | | | | | |
| 2 | | | | | |
| 3 | | | | | |
| 4 Add columns 5 and 10 | | | | | |
| 5 Add columns 6 and 11 | | | | | |
| 6 Subtract line 5 from line 4. Enter here and on Side 2, Part I, line 9 | | | | | |

Schedule G Exploited Exempt Activity Income, other than Advertising Income

| 1 Description of exploited activity (attach schedule if more than one unrelated activity is exploiting the same exempt activity) | 2 Gross unrelated business income from trade or business | 3 Expenses directly connected with production of unrelated business income | 4 Net income from unrelated trade or business, column 2 less column 3 | 5 Gross income from activity that is not unrelated business income | 6 Expenses attributable to column 5 | 7 Excess exempt expense, column 6 less column 5 but not more than column 4 | 8 Net income includible, column 4 less column 7 but not less than zero |
|--|--|--|---|--|-------------------------------------|--|--|
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Total. Enter here and on Side 2, line 10 | | | | | | | |

Schedule H Advertising Income and Excess Advertising Costs

Part I Income from Periodicals Reported on a Consolidated Basis

| 1 Name of periodical | 2 Gross advertising income | 3 Direct advertising costs | 4 Advertising income or excess advertising costs. If column 2 is greater than column 3, complete columns 5, 6, and 7. If column 3 is greater than column 2, enter the excess in Part III, column B(b). Do not complete columns 5, 6, and 7. | 5 Circulation income | 6 Readership costs | 7 If column 5 is greater than column 6, enter the income shown in column 4, in Part III, column A(b). If column 6 is greater than column 5, subtract the sum of column 6 and column 3 from the sum of column 5 and column 2. Enter amount in Part III, column A(b). If the amount is less than zero, enter -0-. |
|----------------------|----------------------------|----------------------------|---|----------------------|--------------------|---|
| a ● | ● | ● | | ● | ● | |
| b ● | ● | ● | | ● | ● | |
| c ● | ● | ● | | ● | ● | |
| Totals | ● | ● | ● | ● | ● | ● |

Part II Income from Periodicals Reported on a Separate Basis

| | | | | | | |
|-----|---|---|---|---|---|---|
| d ● | ● | ● | ● | ● | ● | ● |
| e ● | ● | ● | ● | ● | ● | ● |
| f ● | ● | ● | ● | ● | ● | ● |

Part III Column A - Net Advertising Income

Part III Column B - Excess Advertising Costs

| (a) Enter "consolidated periodical" and/or names of non-consolidated periodicals | (b) Enter total amount from Part I, columns 4 or 7, and amount listed in Part II, columns 4 or 7 | (a) Enter "consolidated periodical" and/or names of non-consolidated periodicals | (b) Enter total amount from Part I, column 4, and amounts listed in Part II, column 4 |
|--|--|--|---|
| ● | ● | ● | ● |
| ● | ● | ● | ● |
| ● | ● | ● | ● |
| Enter total here and on Side 2, Part I, line 11 | ● | Enter total here and on Side 2, Part II, line 27 | ● |

Schedule I Compensation of Officers, Directors, and Trustees

| 1 Name of officer | 2 SSN or ITIN | 3 Title | 4 Percent of time devoted to business | 5 Compensation attributable to unrelated business | 6 Expense account allowances |
|---|---------------|---------|---------------------------------------|---|------------------------------|
| | | | % | | |
| | | | % | | |
| | | | % | | |
| | | | % | | |
| | | | % | | |
| Total. Enter here and on Side 2, Part II, line 14 | | | | | |

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

| 1 Group and guideline class or description of property | 2 Date acquired (mm/dd/yyyy) | 3 Cost or other basis | 4 Depreciation allowed or allowable in prior years | 5 Method of computing depreciation | 6 Life or rate | 7 Depreciation for this year |
|---|------------------------------|-----------------------|--|------------------------------------|----------------|------------------------------|
| 1 Total additional first-year depreciation (do not include in items below) | | | | | | |
| 2 Other depreciation: | | | | | | |
| Buildings | | | | | | |
| Furniture and fixtures | | | | | | |
| Transportation equipment | | | | | | |
| Machinery and other equipment | | | | | | |
| Other (specify) | | | | | | |
| 3 Other depreciation | | | | | | |
| 4 Total | | | | | | |
| 5 Amount of depreciation claimed elsewhere on return | | | | | | |
| 6 Balance. Subtract line 5 from line 4. Enter here and on Side 2, Part II, line 21a | | | | | | |

Sales of Business Property

2022

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

D-1

Complete and attach this schedule to your tax return only if your California gains or losses are different from your federal gains or losses.

Table with 2 columns: Name(s) as shown on tax return (MAX M. & MARJORIE S. FISHER FOUNDATION, INC.) and SSN, ITIN, CA SOS file no., California Corp. no., or FEIN (8007302, 38-1784340)

Part I Sales or Exchanges of Property Used in a Trade or Business and Involuntary Conversions From Other Than Casualty and Theft - Property Held More Than 1 Year. Use federal Form 4684, Casualties and Thefts, to report involuntary conversions from casualty and theft.

- 1a Enter the gross proceeds from sales or exchanges reported to you for 2022 on federal Form 1099-B, Proceeds from Broker and Barter Exchange Transactions, or federal Form 1099-S, Proceeds from Real Estate Transactions (or a substitute statement), that you are including on line 2 or line 10, column (d), or line 23
1b Enter the total amount of gain that you are including on lines 2, 10, and 27 due to the partial dispositions of MACRS assets. See instructions
1c Enter the total amount of loss that you are including on lines 2 and 10 due to the partial dispositions of MACRS assets. See instructions

Table with 7 columns: (a) Description of property, (b) Date acquired, (c) Date sold, (d) Gross sales price, (e) Depreciation allowed or allowable since acquisition, (f) Cost or other basis, plus improvements and expense of sale, (g) Gain or (Loss) Subtract (f) from the sum of (d) and (e). Includes entry for STATEMENT 7 with a gain of 52,998.

- 3 Gain, if any, from federal Form 4684, line 39
4 IRC Section 1231 gain from installment sales from form FTB 3805E, line 26 or line 37
5 IRC Section 1231 gain or (loss) from like-kind exchanges from federal Form 8824 (completed using California amounts)
6 Gain, if any, from line 35, from other than casualty and theft
7 Combine line 2 through line 6. Enter gain or (loss) here and on the appropriate line as follows: 52,998

IRC Section 179 Assets: For reporting the sale or disposition of assets for which an IRC Section 179 expense deduction was claimed in a prior year, see instr. Partnerships or LLCs (classified as partnerships): Enter the gain or (loss) on Schedule K (565 or 568), line 10. Skip lines 8, 9, 11, and 12 below. S corporations: If line 7 is zero or a loss, enter the amount on line 11 below and skip line 8 and line 9. If line 7 is a gain, continue to line 8. All others: If line 7 is zero or a loss, enter the amount on line 11 below and skip line 8 and line 9. If line 7 is a gain and you did not have any prior year IRC Section 1231 losses, or they were recaptured in an earlier year, enter the gain as follows: Forms 540 and 540NR filers, enter the gain on Schedule D (540 or 540NR), line 1, and skip lines 8, 9, and 12 below; Forms 100 and 100W filers, enter the gain on Form 100 or 100W, Side 6, Schedule D, Part II, line 6, and skip lines 8, 9, and 12 below.

- 8 Nonrecaptured net IRC Section 1231 losses from prior years. Enter as a positive number. See instructions
9 Subtract line 8 from line 7. If zero or less, enter -0- 52,998
S corporations: If line 9 is more than zero, enter this amount on Schedule D (100S), Section B, Part II, line 5 and enter the amount, if any, from line 8 on line 12 below. If line 9 is zero, enter the amount from line 7 on line 12 below. All others: If line 9 is more than zero, enter the amount from line 8 on line 12 below, and enter the amount from line 9 as follows: Forms 540 and 540NR filers, enter as a capital gain on Schedule D (540 or 540NR), line 1; Forms 100 and 100W filers, enter the gain on Form 100 or 100W, Side 6, Schedule D, Part II, line 6. If line 9 is zero, enter the amount from line 7 on line 12 below. See instructions.

Part II Section A - Ordinary Gains and Losses

Table with 7 columns: (a) Description of property, (b) Date acquired, (c) Date sold, (d) Gross sales price, (e) Depreciation allowed or allowable since acquisition, (f) Cost or other basis, plus improvements and expense of sale, (g) Gain or (Loss) Subtract (f) from the sum of (d) and (e).

- 11 Loss, if any, from line 7
12 Gain, if any, from line 7, or amount from line 8, if applicable. See instructions
13 Gain, if any, from line 34
14 Net gain or (loss) from federal Form 4684, line 31 and line 38a (completed using California amounts)
15 Ordinary gain from installment sales from form FTB 3805E, line 25 or line 36. See instructions
16 Ordinary gain or (loss) from like-kind exchanges from federal Form 8824 (completed using California amounts)
17 Combine line 10 through line 16
18 For all except individual tax returns, enter the amount from line 17 on the appropriate line of your tax return and skip line a and line b below. For individual tax returns, complete line a and line b below; see instructions.
a If the loss on line 11 includes a loss from federal Form 4684, Section B, Part II, column (b)(ii) of line 30 or line 35, enter that part of the loss here. See instructions
b Redetermine the gain or (loss) on line 17, excluding the loss, if any, on line 18a. Enter here and on line 20

Part II Section B - Adjusting California Ordinary Gain or Loss For individual tax returns (Forms 540 and 540NR) only.

| | | | | |
|----|--|-----------------------|-----|--|
| 19 | Enter ordinary federal gain or (loss) from federal Schedule 1 (Form 1040), line 4 | <input type="radio"/> | 19 | |
| 20 | Enter ordinary California gain or (loss) from line 18b | <input type="radio"/> | 20 | |
| 21 | Ordinary gain or loss adjustment: Compare line 19 and line 20. See instructions. | | | |
| a | If line 19 is more than line 20, enter the difference here and on Sch. CA (540), Part I or Sch. CA (540NR), Part II, Section B, line 4, col. B | <input type="radio"/> | 21a | |
| b | If line 20 is more than line 19, enter the difference here and on Sch. CA (540), Part I or Sch. CA (540NR), Part II, Section B, line 4, col. C | <input type="radio"/> | 21b | |

Part III Gain from Disposition of Property Under IRC Sections 1245, 1250, 1252, 1254, and 1255

| Description of IRC Sections 1245, 1250, 1252, 1254, and 1255 property. | Date acquired (mm/dd/yyyy) | Date sold (mm/dd/yyyy) |
|--|----------------------------|------------------------|
| 22 A <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| B <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| C <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| D <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| Relate the properties on lines 22A through 22D to these columns | Property A | Property B | Property C | Property D |
|--|---------------------------|-----------------------|-----------------------|-----------------------|
| 23 Gross sales price | 23 <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 24 Cost or other basis plus expense of sale | 24 <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 25 Depreciation (or depletion) allowed or allowable | 25 <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 26 Adjusted basis. Subtract line 25 from line 24 | 26 <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 27 Total gain. Subtract line 26 from line 23 | 27 <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 28 If IRC Section 1245 property: | | | | |
| a Depreciation allowed or allowable from line 25 | 28a <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| b Enter the smaller of line 27 or line 28a | 28b <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 29 If IRC Section 1250 property: If straight-line depreciation was used, enter -0- on line 29g, except for a corporation subject to IRC Sec. 291: | | | | |
| a Additional depreciation after 12/31/76 | 29a <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| b Applicable percentage multiplied by the smaller of line 27 or line 29a | 29b <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| c Subtract line 29a from line 27. If line 27 is not more than line 29a, skip line 29d and line 29e | 29c <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| d Additional depreciation after 12/31/70 and before 1/1/77 | 29d <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| e Enter the smaller of line 29c or line 29d | 29e <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| f IRC Section 291 amount (for corporations only) | 29f <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| g Add line 29b, line 29e, and line 29f | 29g <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 30 If IRC Section 1252 property: Skip section if you did not dispose of farm land or if form is being completed for a partnership. | | | | |
| a Soil, water, and land clearing expenses | 30a <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| b Applicable percentage multiplied by line 30a | 30b <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| c Enter the smaller of line 27 or line 30b | 30c <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 31 If IRC Section 1254 property: | | | | |
| a Intangible drilling and development costs deducted after 12/31/76 | 31a <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| b Enter the smaller of line 27 or line 31a | 31b <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 32 If IRC Section 1255 property: | | | | |
| a Applicable percentage of payments excluded from income under IRC Section 126 | 32a <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| b Enter the smaller of line 27 or line 32a | 32b <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Summary of Part III Gains. Complete property column A through column D for line 23 through line 32b before going to line 33.

| | | | | |
|----|--|-----------------------|----|--|
| 33 | Total gains for all properties. Add column A through column D of line 27 | <input type="radio"/> | 33 | |
| 34 | Add column A through column D of lines 28b, 29g, 30c, 31b, and 32b. Enter here and on line 13 | <input type="radio"/> | 34 | |
| 35 | Subtract line 34 from line 33. Enter the portion from other than casualty and theft here and on line 6. Enter the portion from casualty and theft on federal Form 4684, line 33 | <input type="radio"/> | 35 | |

Part IV Recapture Amounts Under IRC Sections 179 and 280F(b)(2) When Business Use Drops to 50% or Less

| | (a) Expense deductions | (b) Recovery deductions |
|----|---|-------------------------|
| 36 | Expense deductions or recovery deductions. See instructions | <input type="radio"/> |
| 37 | Depreciation or recovery deductions. See instructions | <input type="radio"/> |
| 38 | Recapture amount. Subtract line 37 from line 36. See instructions | <input type="radio"/> |

SCHEDULE D-1

PROPERTY HELD MORE THAN ONE YEAR

STATEMENT 7

| PROPERTY DESCRIPTION | DATE ACQUIRED | DATE SOLD | SALES PRICE | DEPR. ALLOWED | COST OR BASIS | GAIN OR (LOSS) |
|---|---------------|-----------|-------------|---------------|---------------|----------------|
| BLACKSTONE RE PARTNERS V.TE.2 | VARIOUS | VARIOUS | | | | 3,512. |
| BLACKSTONE RE PARTNERS VI.TE.2 | VARIOUS | VARIOUS | | | | 64. |
| BREP VII.F (AV-LH) | VARIOUS | VARIOUS | | | | 480. |
| BREP VII.F (AV-LH.4) | VARIOUS | VARIOUS | | | | 1,742. |
| BREP VII.F-NQ (AV-LH.3) | VARIOUS | VARIOUS | | | | 76,337. |
| BREP VII.F-NQ (AV-LH.4) | VARIOUS | VARIOUS | | | | 637,900. |
| BREP VIII.F (AV-LH) | VARIOUS | VARIOUS | | | | 4,509. |
| BREP VIII.F (AV-LH.3) | VARIOUS | VARIOUS | | | | 546. |
| BREP VIII.F (AV-LH.4) | VARIOUS | VARIOUS | | | | 33,945. |
| BREP VIII.F-NQ (AV-LH.2) | VARIOUS | VARIOUS | | | | 761. |
| BREP VIII.F-NQ (AV-LH.3) | VARIOUS | VARIOUS | | | | -815. |
| BREP VIII.F-NQ (AV-LH.4) | VARIOUS | VARIOUS | | | | 5,167. |
| FPA APARTMENT OPPORTUNITY FUND V-A | VARIOUS | VARIOUS | | | | 13,024. |
| MAXIMUM PRIVATE GROWTH FUND | VARIOUS | VARIOUS | | | | 147,369. |
| SCULPTOR REAL ESTATE PARALLEL FUND III A | VARIOUS | VARIOUS | | | | -2,345. |
| BREP VIII.F-NQ (AV-LH) | VARIOUS | VARIOUS | | | | -26. |
| ADJUSTMENT FOR GAIN ALLOCABLE TO OTHER STATES | VARIOUS | VARIOUS | | | | -869,172. |
| TOTAL TO SCH D-1, PART I, LINE 2 | | | | | | 52,998. |

MAX M. & MARJORIE S. FISHER FOUNDATION

Non-unitary partnership business income or loss allocable to California FEIN: 38-1784340

For the Tax Year 2022

| | FEIN Total | Withholding | |
|-------------------------------|-------------------|--------------------|------------|
| BREP VII.F (AV-LH.4) | 30-0746590 | (2,179) | - |
| BREP VII.F NQ (AV-LH.3) | 32-0384657 | 35,602 | - |
| Sculptor RE Parallel Fd III-A | 80-0961650 | 10,724 | - |
| BREP VIII.F (AV-LH) | 47-3861773 | 4,618 | 11 |
| BREP VIII.F (AV-LH.2) | 81-1172961 | 5 | - |
| BREP VIII.F (AV-LH.3) | 81-3436786 | (2,806) | 53 |
| BREP VIII.F (AV-LH.4) | 82-3091815 | 5,366 | 520 |
| BREP VIII.F NQ (AV-LH) | 47-3845317 | 9,219 | - |
| BREP VIII.F-NQ (AV-LH.2) | 81-3401726 | (700) | - |
| BREP VIII.F-NQ (AV-LH.3) | 82-3091686 | (1,822) | - |
| BREP VIII.F-NQ (AV-LH.4) | 84-2605874 | 57 | 0 |
| Total CALIFORNIA UBTI | | 58,084 | 584 |

STATEMENT 1

Resident and Nonresident Withholding Tax Statement

2022

592-B

Amended

Part I Withholding Agent Information

Name of withholding agent (from Form 592, 592-PTE, or 592-F) BLACKSTONE REAL ESTATE PARTNERS VIII. F (AV-LH) L.P. Address (apt./ste., room, PO box, or PMB no.) C/O THE BLACKSTONE GROUP City (If you have a foreign address, see instructions.) NEW YORK State NY ZIP code 10154

Part II Payee Information

Name of payee THE MAX M. & MARJORIE S. FISHER FOUNDATION, INC Address (apt./ste., room, PO box, or PMB no.) TWO TOWNE SQUARE, SUITE 900 City (If you have a foreign address, see instructions.) SOUTHFIELD State MI ZIP code 48076

Part III Type of Income Subject to Withholding. Check the applicable box(es)

A Payments to Independent Contractors B Trust Distributions C Rents or Royalties D Distributions to Domestic (U.S.) Nonresident Partners/Members/Beneficiaries/S Corporation Shareholders E Estate Distributions F Elective Withholding G Elective Withholding/Indian Tribe H Allocations to Foreign (non-U.S.) Nonresident Partners/Members I Other

Part IV Tax Withheld

Table with 3 rows: 1 Total income subject to withholding (4,618), 2 Total resident and/or nonresident tax withheld (excluding backup withholding) (11), 3 Total backup withholding.

2022 Instructions for Form 592-B

Resident and Nonresident Withholding Tax Statement

References in these instructions are to the Internal Revenue Code (IRC) as of January 1, 2015, and to the California Revenue and Taxation Code (R&TC).

General Information

California Revenue and Taxation Code (R&TC) Sections 18662 and 18664 require the withholding agent to provide a completed Form 592-B, Resident and Nonresident Withholding Tax Statement, to the payee to report the amount of payment or distribution subject to withholding and tax.

Pass-Through Entity Annual Withholding Return

For taxable years beginning on or after January 1, 2020, a pass-through entity that has paid withholding on behalf of a nonresident owner or has been withheld upon must use Form 592-PTE, Pass-Through Entity Annual Withholding Return, to report the total withholding.

Backup Withholding - With certain limited exceptions, payers that are required to withhold and remit backup withholding to the Internal Revenue Service (IRS) are also required to withhold and remit to the Franchise Tax Board (FTB) on income sourced to California. The California backup withholding rate is 7% of the payment.

If a payee has backup withholding, the payee must contact the FTB to provide a valid Taxpayer Identification Number (TIN) before filing a tax return. The following are acceptable TINs: social security number (SSN); individual taxpayer identification number (ITIN); federal employer identification number (FEIN); California corporation number (CA Corp no.); or California Secretary of State (CA SOS) file number.

Registered Domestic Partners (RDPs) -

For purposes of California income tax, references to a spouse, husband, or wife also refer to a California RDP, unless otherwise specified. When we use the initials RDP they refer to both a California registered domestic "partner" and a California registered domestic "partnership," as applicable.

A Purpose

Use Form 592-B to report to the payee the amount of payment or distribution subject to withholding and tax withheld as reported on Form 592, Resident and Nonresident Withholding Statement, Form 592-PTE, or Form 592-F, Foreign Partner or Member Annual Withholding Return. Complete a separate Form 592-B for each payee.

Form 592-B is provided to the payee to file with their state tax return. This form can be provided to the payee electronically.

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BLACKSTONE REAL ESTATE PARTNERS VIII. F (AV-LH) L.P.
CALIFORNIA 592-B FOOTNOTE

PARTNER #: 1741

47-3861773

The Max M. & Marjorie S. Fisher Foundation, Inc

THE FUND REMITTED CALIFORNIA QUARTERLY NONRESIDENT WITHHOLDING PAYMENTS TO THE STATE ON YOUR BEHALF DURING THE 2022 TAX YEAR BASED UPON CASH DISTRIBUTIONS OF CA SOURCED INCOME. THE AMOUNTS INCLUDED ON THE ENCLOSED CA FORM 592-B REPRESENT THE AGGREGATE AMOUNT OF THESE QUARTERLY NONRESIDENT WITHHOLDINGS PAID ON YOUR BEHALF. PLEASE CONSULT YOUR TAX ADVISOR.

Resident and Nonresident Withholding Tax Statement

2022

592-B

Amended

Part I Withholding Agent Information

| | | | | |
|--|-------|----------|--|--|
| Name of withholding agent (from Form 592, 592-PTE, or 592-F) | | | SSN or ITIN | |
| BLACKSTONE REAL ESTATE PARTNERS VIII. F (AV-LH.3) L.P. | | | | |
| Address (apt./ste., room, PO box, or PMB no.) | | | <input checked="" type="checkbox"/> FEIN <input type="checkbox"/> CA Corp no. <input type="checkbox"/> CA SOS file no. | |
| C/O THE BLACKSTONE GROUP | | | 81-3436786 | |
| City (If you have a foreign address, see instructions.) | State | ZIP code | Daytime telephone number | |
| NEW YORK | NY | 10154 | | |

Part II Payee Information

| | | | | |
|---|-------|----------|--|--|
| Name of payee | | | SSN or ITIN | |
| THE MAX M. & MARJORIE S. FISHER FOUNDATION, INC | | | | |
| Address (apt./ste., room, PO box, or PMB no.) | | | <input checked="" type="checkbox"/> FEIN <input type="checkbox"/> CA Corp no. <input type="checkbox"/> CA SOS file no. | |
| TWO TOWNE SQUARE, SUITE 900 | | | XX-XXX4340 | |
| City (If you have a foreign address, see instructions.) | State | ZIP code | | |
| SOUTHFIELD | MI | 48076 | | |

Part III Type of Income Subject to Withholding. Check the applicable box(es)

| | | |
|--|--|---|
| <input type="checkbox"/> A Payments to Independent Contractors | <input type="checkbox"/> E Estate Distributions | <input type="checkbox"/> H Allocations to Foreign (non-U.S.) Nonresident Partners/Members |
| <input type="checkbox"/> B Trust Distributions | <input type="checkbox"/> F Elective Withholding | <input type="checkbox"/> I Other _____ |
| <input type="checkbox"/> C Rents or Royalties | <input type="checkbox"/> G Elective Withholding/Indian Tribe | |
| <input checked="" type="checkbox"/> D Distributions to Domestic (U.S.) Nonresident Partners/Members/Beneficiaries/S Corporation Shareholders | | |

Part IV Tax Withheld

| | | |
|---|---|---------|
| 1 Total income subject to withholding | 1 | (2,806) |
| 2 Total resident and/or nonresident tax withheld (excluding backup withholding) | 2 | 53 |
| 3 Total backup withholding | 3 | |

2022 Instructions for Form 592-B

Resident and Nonresident Withholding Tax Statement

References in these instructions are to the Internal Revenue Code (IRC) as of **January 1, 2015**, and to the California Revenue and Taxation Code (R&TC).

General Information

California Revenue and Taxation Code (R&TC) Sections 18662 and 18664 require the withholding agent to provide a completed Form 592-B, Resident and Nonresident Withholding Tax Statement, to the payee to report the amount of payment or distribution subject to withholding and tax. The payee must file Form 592-B with their California tax return to claim the credit for the withheld amount. See General Information A Purpose, for more information.

Pass-Through Entity Annual Withholding Return

- For taxable years beginning on or after January 1, 2020, a pass-through entity that has paid withholding on behalf of a nonresident owner or has been withheld upon must use Form 592-PTE, Pass-Through Entity Annual Withholding Return, to report the total withholding. For more information, get Form 592-PTE.

Backup Withholding – With certain limited exceptions, payers that are required to withhold and remit backup withholding to the Internal Revenue Service (IRS) are also required to withhold and remit to the Franchise Tax Board (FTB) on income sourced to California. The California backup withholding rate is 7% of the payment. For California purposes, dividends, interests, and any financial institutions release of loan funds made in the normal course of business are exempt from backup withholding. For additional information on California backup withholding, go to ftb.ca.gov and search for **backup withholding**.

If a payee has backup withholding, the payee must contact the FTB to provide a valid Taxpayer Identification Number (TIN) before filing a tax return. The following are acceptable TINs: social security number (SSN); individual taxpayer identification number (ITIN); federal employer identification number (FEIN); California corporation number (CA Corp no.); or California Secretary of State (CA SOS) file number. Failure to provide a valid TIN will result in the denial of the backup withholding credit.

Registered Domestic Partners (RDPs) –

For purposes of California income tax, references to a spouse, husband, or wife also refer to a California RDP, unless otherwise specified. When we use the initials RDP they refer to both a California registered domestic “partner” and a California registered domestic “partnership,” as applicable. For more information on RDPs, get FTB Pub. 737, Tax Information for Registered Domestic Partners.

A Purpose

Use Form 592-B to report to the payee the amount of payment or distribution subject to withholding and tax withheld as reported on Form 592, Resident and Nonresident Withholding Statement, Form 592-PTE, or Form 592-F, Foreign Partner or Member Annual Withholding Return. Complete a separate Form 592-B for each payee.

Form 592-B is provided to the payee to file with their state tax return. This form can be provided to the payee electronically.

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BLACKSTONE REAL ESTATE PARTNERS VIII. F (AV-LH.3) L.P.
CALIFORNIA 592-B FOOTNOTE

PARTNER #: 1741

81-3436786

The Max M. & Marjorie S. Fisher Foundation, Inc

THE FUND REMITTED CALIFORNIA QUARTERLY NONRESIDENT WITHHOLDING PAYMENTS TO THE STATE ON YOUR BEHALF DURING THE 2022 TAX YEAR BASED UPON CASH DISTRIBUTIONS OF CA SOURCED INCOME. THE AMOUNTS INCLUDED ON THE ENCLOSED CA FORM 592-B REPRESENT THE AGGREGATE AMOUNT OF THESE QUARTERLY NONRESIDENT WITHHOLDINGS PAID ON YOUR BEHALF. PLEASE CONSULT YOUR TAX ADVISOR.

Resident and Nonresident Withholding Tax Statement

2022

592-B

Amended

Part I Withholding Agent Information

| | | | | |
|---|--------------------|--------------------------|---|--|
| Name of withholding agent (from Form 592, 592-PTE, or 592-F) BLACKSTONE REAL ESTATE PARTNERS VIII. F (AV-LH.4) L.P. | | | SSN or ITIN | |
| Address (apt./ste., room, PO box, or PMB no.) C/O THE BLACKSTONE GROUP | | | <input checked="" type="checkbox"/> FEIN <input type="checkbox"/> CA Corp no. <input type="checkbox"/> CA SOS file no. 82-3091815 | |
| City (If you have a foreign address, see instructions.) NEW YORK | State NY | ZIP code 10154 | Daytime telephone number | |

Part II Payee Information

| | | | | |
|---|--------------------|--------------------------|---|--|
| Name of payee THE MAX M. & MARJORIE S. FISHER FOUNDATION, INC | | | SSN or ITIN | |
| Address (apt./ste., room, PO box, or PMB no.) TWO TOWNE SQUARE, SUITE 900 | | | <input checked="" type="checkbox"/> FEIN <input type="checkbox"/> CA Corp no. <input type="checkbox"/> CA SOS file no. XX-XXX4340 | |
| City (If you have a foreign address, see instructions.) SOUTHFIELD | State MI | ZIP code 48076 | | |

Part III Type of Income Subject to Withholding. Check the applicable box(es)

| | | |
|---|---|--|
| <input type="checkbox"/> A Payments to Independent Contractors | <input type="checkbox"/> E Estate Distributions | <input type="checkbox"/> H Allocations to Foreign (non-U.S.) Nonresident Partners/Members |
| <input type="checkbox"/> B Trust Distributions | <input type="checkbox"/> F Elective Withholding | <input type="checkbox"/> I Other _____ |
| <input type="checkbox"/> C Rents or Royalties | <input type="checkbox"/> G Elective Withholding/Indian Tribe | |
| <input checked="" type="checkbox"/> D Distributions to Domestic (U.S.) Nonresident Partners/Members/Beneficiaries/S Corporation Shareholders | | |

Part IV Tax Withheld

| | | |
|--|----------|--------------|
| 1 Total income subject to withholding | 1 | 5,366 |
| 2 Total resident and/or nonresident tax withheld (excluding backup withholding) | 2 | 520 |
| 3 Total backup withholding | 3 | |

2022 Instructions for Form 592-B

Resident and Nonresident Withholding Tax Statement

References in these instructions are to the Internal Revenue Code (IRC) as of **January 1, 2015**, and to the California Revenue and Taxation Code (R&TC).

General Information

California Revenue and Taxation Code (R&TC) Sections 18662 and 18664 require the withholding agent to provide a completed Form 592-B, Resident and Nonresident Withholding Tax Statement, to the payee to report the amount of payment or distribution subject to withholding and tax. The payee must file Form 592-B with their California tax return to claim the credit for the withheld amount. See General Information A Purpose, for more information.

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If a payee has backup withholding, the payee must contact the FTB to provide a valid Taxpayer Identification Number (TIN) before filing a tax return. The following are acceptable TINs: social security number (SSN); individual taxpayer identification number (ITIN); federal employer identification number (FEIN); California corporation number (CA Corp no.); or California Secretary of State (CA SOS) file number. Failure to provide a valid TIN will result in the denial of the backup withholding credit.

Registered Domestic Partners (RDPs) –

For purposes of California income tax, references to a spouse, husband, or wife also refer to a California RDP, unless otherwise specified. When we use the initials RDP they refer to both a California registered domestic “partner” and a California registered domestic “partnership,” as applicable. For more information on RDPs, get FTB Pub. 737, Tax Information for Registered Domestic Partners.

A Purpose

Use Form 592-B to report to the payee the amount of payment or distribution subject to withholding and tax withheld as reported on Form 592, Resident and Nonresident Withholding Statement, Form 592-PTE, or Form 592-F, Foreign Partner or Member Annual Withholding Return. Complete a separate Form 592-B for each payee.

Form 592-B is provided to the payee to file with their state tax return. This form can be provided to the payee electronically.

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BLACKSTONE REAL ESTATE PARTNERS VIII. F (AV-LH.4) L.P.
CALIFORNIA 592-B FOOTNOTE

PARTNER #: 1741

82-3091815

The Max M. & Marjorie S. Fisher Foundation, Inc

THE FUND REMITTED CALIFORNIA QUARTERLY NONRESIDENT WITHHOLDING PAYMENTS TO THE STATE ON YOUR BEHALF DURING THE 2022 TAX YEAR BASED UPON CASH DISTRIBUTIONS OF CA SOURCED INCOME. THE AMOUNTS INCLUDED ON THE ENCLOSED CA FORM 592-B REPRESENT THE AGGREGATE AMOUNT OF THESE QUARTERLY NONRESIDENT WITHHOLDINGS PAID ON YOUR BEHALF. PLEASE CONSULT YOUR TAX ADVISOR.

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

Department of the Treasury
Internal Revenue Service

▶ **File a separate application for each return.**
▶ **Go to www.irs.gov/Form8868 for the latest information.**

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

| | | |
|--|--|---|
| Type or print | Name of exempt organization or other filer, see instructions. MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Taxpayer identification number (TIN) 38-1784340 |
| File by the due date for filing your return. See instructions. | Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | |
| | City, town or post office, state, and ZIP code. For a foreign address, see instructions. SOUTHFIELD, MI 48076 | |

Enter the Return Code for the return that this application is for (file a separate application for each return) 0 4

| Application Is For | Return Code | Application Is For | Return Code |
|--|-------------|-----------------------------------|-------------|
| Form 990 or Form 990-EZ | 01 | Form 1041-A | 08 |
| Form 4720 (individual) | 03 | Form 4720 (other than individual) | 09 |
| Form 990-PF | 04 | Form 5227 | 10 |
| Form 990-T (sec. 401(a) or 408(a) trust) | 05 | Form 6069 | 11 |
| Form 990-T (trust other than above) | 06 | Form 8870 | 12 |
| Form 990-T (corporation) | 07 | | |

EMILY DIEGEL

- The books are in the care of ▶ **TWO TOWNE SQUARE #900 - SOUTHFIELD, MI 48076**

Telephone No. ▶ **248-415-1440** Fax No. ▶ _____

- If the organization does not have an office or place of business in the United States, check this box
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) _____. If this is for the whole group, check this box . If it is for part of the group, check this box and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6-month extension of time until **NOVEMBER 15, 2023**, to file the exempt organization return for the organization named above. The extension is for the organization's return for:

- ▶ calendar year **2022** or
- ▶ tax year beginning _____, and ending _____.

2 If the tax year entered in line 1 is for less than 12 months, check reason: Initial return Final return Change in accounting period

| | | | |
|---|-----------|----|----------|
| 3a If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions. | 3a | \$ | 310,000. |
| b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. | 3b | \$ | 150,000. |
| c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions. | 3c | \$ | 160,000. |

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.

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

Department of the Treasury
Internal Revenue Service

▶ **File a separate application for each return.**
▶ **Go to www.irs.gov/Form8868 for the latest information.**

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

| | | |
|--|--|---|
| Type or print | Name of exempt organization or other filer, see instructions. MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Taxpayer identification number (TIN) 38-1784340 |
| File by the due date for filing your return. See instructions. | Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | |
| | City, town or post office, state, and ZIP code. For a foreign address, see instructions. SOUTHFIELD, MI 48076 | |

Enter the Return Code for the return that this application is for (file a separate application for each return) 0 | 7

| Application Is For | Return Code | Application Is For | Return Code |
|--|-------------|-----------------------------------|-------------|
| Form 990 or Form 990-EZ | 01 | Form 1041-A | 08 |
| Form 4720 (individual) | 03 | Form 4720 (other than individual) | 09 |
| Form 990-PF | 04 | Form 5227 | 10 |
| Form 990-T (sec. 401(a) or 408(a) trust) | 05 | Form 6069 | 11 |
| Form 990-T (trust other than above) | 06 | Form 8870 | 12 |
| Form 990-T (corporation) | 07 | | |

EMILY DIEGEL

- The books are in the care of ▶ **TWO TOWNE SQUARE #900 - SOUTHFIELD, MI 48076**

Telephone No. ▶ **248-415-1440** Fax No. ▶ _____

- If the organization does not have an office or place of business in the United States, check this box
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) _____. If this is for the whole group, check this box . If it is for part of the group, check this box and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6-month extension of time until **NOVEMBER 15, 2023**, to file the exempt organization return for the organization named above. The extension is for the organization's return for:
▶ calendar year **2022** or
▶ tax year beginning _____, and ending _____.

2 If the tax year entered in line 1 is for less than 12 months, check reason: Initial return Final return
 Change in accounting period

| | | | |
|---|-----------|----|----------|
| 3a If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions. | 3a | \$ | 0. |
| b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. | 3b | \$ | 125,000. |
| c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions. | 3c | \$ | 0. |

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.

TAX RETURN FILING INSTRUCTIONS

CALIFORNIA FORM RRF-1

FOR THE YEAR ENDING
DECEMBER 31, 2022

PREPARED FOR:

MS. EMILY DIEGEL
MAX M. & MARJORIE S. FISHER FOUNDATION
TWO TOWNE SQUARE 900
SOUTHFIELD, MI 48076

PREPARED BY:

PLANTE & MORAN, PLLC
2601 CAMBRIDGE CT., STE. 300
AUBURN HILLS, MI 48326

AMOUNT OF TAX:

BALANCE DUE OF \$400

MAKE CHECK PAYABLE TO:

DEPARTMENT OF JUSTICE

MAIL TAX RETURN TO:

REGISTRY OF CHARITABLE TRUSTS
P.O. BOX 903447
SACRAMENTO, CA 94203-4470

RETURN MUST BE MAILED ON OR BEFORE:

NOVEMBER 15, 2023.

SPECIAL INSTRUCTIONS:

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

REQUIRED ATTACHMENTS FROM THE FEDERAL RETURN, FORM 990-PF, HAVE BEEN ATTACHED TO THE FILING COPY OF THIS RETURN.

**ANNUAL REGISTRATION RENEWAL FEE REPORT
TO ATTORNEY GENERAL OF CALIFORNIA**
Sections 12586 and 12587, California Government Code
11 Cal. Code Regs. sections 301-306, 309, 311, and 312

Failure to submit this report annually no later than four months and fifteen days after the end of the organization's accounting period may result in the loss of tax exemption and the assessment of a minimum tax of \$800, plus interest, and/or fines or filing penalties. Revenue & Taxation Code section 23703; Government Code section 12586.1. IRS extensions will be honored.

MAIL TO:
Registry of Charitable Trusts
P.O. Box 903447
Sacramento, CA 94203-4470
STREET ADDRESS:
1300 I Street
Sacramento, CA 95814
(916) 210-6400
WEBSITE ADDRESS:
www.oag.ca.gov/charities

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

Name of Organization

List all DBAs and names the organization uses or has used

TWO TOWNE SQUARE, NO. 900

Address (Number and Street)

SOUTHFIELD, MI 48076

City or Town, State, and ZIP Code

248-415-4000

Telephone Number

E-mail Address

Check if:

- Change of address
 Amended report

State Charity Registration Number **CT0249783**

Corporation or Organization No. **8007302**

Federal Employer ID No. **38-1784340**

ANNUAL REGISTRATION RENEWAL FEE SCHEDULE (11 Cal. Code Regs. sections 301-307, 311, and 312)
Make Check Payable to Department of Justice

| Total Revenue | Fee | Total Revenue | Fee | Total Revenue | Fee |
|---------------------------------|------|--------------------------------------|-------|---|---------|
| Less than \$50,000 | \$25 | Between \$250,001 and \$1 million | \$100 | Between \$20,000,001 and \$100 million | \$800 |
| Between \$50,000 and \$100,000 | \$50 | Between \$1,000,001 and \$5 million | \$200 | Between \$100,000,001 and \$500 million | \$1,000 |
| Between \$100,001 and \$250,000 | \$75 | Between \$5,000,001 and \$20 million | \$400 | Greater than \$500 million | \$1,200 |

PART A - ACTIVITIES

For your most recent full accounting period (beginning 01/01/2022 ending 12/31/2022) list:

Total Revenue (including noncash contributions) \$ 9,896,483 Noncash Contributions \$ 0 Total Assets \$ 279,901,104
Program Expenses \$ 17,423,510 Total Expenses \$ 23,126,911

PART B - STATEMENTS REGARDING ORGANIZATION DURING THE PERIOD OF THIS REPORT

Note: All questions must be answered. If you answer "yes" to any of the questions below, you must attach a separate page providing an explanation and details for each "yes" response. Please review RRF-1 instructions for information required.

| | Yes | No |
|--|-----|----|
| 1. During this reporting period, were there any contracts, loans, leases or other financial transactions between the organization and any officer, director or trustee thereof, either directly or with an entity in which any such officer, director or trustee had any financial interest? | | X |
| 2. During this reporting period, was there any theft, embezzlement, diversion or misuse of the organization's charitable property or funds? | | X |
| 3. During this reporting period, were any organization funds used to pay any penalty, fine or judgment? | | X |
| 4. During this reporting period, were the services of a commercial fundraiser, fundraising counsel for charitable purposes, or commercial coventurer used? | | X |
| 5. During this reporting period, did the organization receive any governmental funding? | | X |
| 6. During this reporting period, did the organization hold a raffle for charitable purposes? | | X |
| 7. Does the organization conduct a vehicle donation program? | | X |
| 8. Did the organization conduct an independent audit and prepare audited financial statements in accordance with generally accepted accounting principles for this reporting period? | X | |
| 9. At the end of this reporting period, did the organization hold restricted net assets, while reporting negative unrestricted net assets? | | X |

I declare under penalty of perjury that I have examined this report, including accompanying documents, and to the best of my knowledge and belief, the content is true, correct and complete, and I am authorized to sign.

DOUGLAS STEWART

EXECUTIVE DIRECTOR

Signature of Authorized Agent

Printed Name

Title

Date

TAX RETURN FILING INSTRUCTIONS

FLORIDA FORM F-1120

FOR THE YEAR ENDING
DECEMBER 31, 2022

PREPARED FOR:

MS. EMILY DIEGEL
MAX M. & MARJORIE S. FISHER FOUNDATION
TWO TOWNE SQUARE 900
SOUTHFIELD, MI 48076

PREPARED BY:

PLANTE & MORAN, PLLC
2601 CAMBRIDGE CT., STE. 300
AUBURN HILLS, MI 48326

TO BE SIGNED AND DATED BY:

NOT APPLICABLE

AMOUNT OF TAX:

| | | |
|------------------------------|----|-------|
| TOTAL TAX | \$ | 0 |
| LESS: PAYMENTS AND CREDITS | \$ | 6,221 |
| PLUS: OTHER AMOUNT | | 0 |
| PLUS: INTEREST AND PENALTIES | \$ | 0 |
| OVERPAYMENT | \$ | 6,221 |

OVERPAYMENT:

| | | |
|--------------------------------|----|-------|
| CREDITED TO YOUR ESTIMATED TAX | \$ | 6,221 |
| OTHER AMOUNT | \$ | 0 |
| REFUNDED TO YOU | \$ | 0 |

MAKE CHECK PAYABLE TO:

NOT APPLICABLE

MAIL TAX RETURN AND CHECK (IF APPLICABLE) TO:

THIS RETURN HAS QUALIFIED FOR ELECTRONIC FILING. PLEASE REVIEW THE RETURN FOR COMPLETENESS AND ACCURACY. WE WILL THEN TRANSMIT YOUR RETURN ELECTRONICALLY TO THE FLORIDA DOR. DO NOT MAIL THE PAPER COPY OF THE RETURN TO THE FLORIDA DOR.

RETURN MUST BE MAILED ON OR BEFORE:

RETURN FEDERAL FORM 8879-TE TO US BY NOVEMBER 30, 2023.

SPECIAL INSTRUCTIONS:



Florida Corporate Income/Franchise Tax Return

F-1120, R. 01/23 1019

FEIN 38-1784340

For calendar year 2022 or tax year beginning

JAN 1

, 2022 ending

DEC 31, 2022

Rule 12C-1.051 Florida Administrative Code Effective 01/23 Page 1 of 6

833302022123100020050377338178434000001

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

Address TWO TOWNE SQUARE

City/State/ZIP SOUTHFIELD, MI 48076

Check here if any changes have been made to name or address

Computation of Florida Net Income Tax

Table with 2 columns: Description and Amount. Rows include Federal taxable income, State income taxes, Additions, Total of Lines 1, 2 and 3, Subtractions, Adjusted federal income, Florida portion, Nonbusiness income, Florida exemption, Florida net income, Tax due, Credits, Total corporate income, Payment credits, Total amount due, Credit, and Refund.

244081 10-04-22

Payment Coupon for Florida Corporate Income Tax Return

1019 F-1120 R. 01/23

Do Not Detach

YEAR ENDING 12/31/22

To ensure proper credit to your account, enclose your check with tax return when mailing.

Name MAX M. & MARJORIE S. FISHER F

Address INC.

Address TWO TOWNE SQUARE

City/State/ZIP SOUTHFIELD, MI 48076

If 6/30 year end, return is due 1st day of the 4th month after the close of the taxable year, otherwise return is due 1st day of the 5th month after the close of the taxable year.

Table with 4 columns: Identification number, Amount, and other values. Rows include 381784340, 20220101, 20221231, 00000000, 012, 201, 11677000, and 0.

-622100

8333 0 20221231 0002005037 7 3381784340 0000 1



MAX M. & MARJORIE S. FISHER FOUNDATI

FEIN 38-1784340

1019
F-1120
R. 01/23
Page 2 of 6
12/31/22

This return is considered incomplete unless a copy of the federal return is attached.
If your return is not signed, or improperly signed and verified, it will be subject to a penalty. The statute of limitations will not start until your return is properly signed and verified. Your return must be completed in its entirety.

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 taxpayer) is based on all information of which preparer has any knowledge.
Sign here: Signature of officer (must be an original signature) Date Title EXECUTIVE DIRECTOR
Paid preparers only: Preparer's signature DORI J. EGGETT Date 11/08/23 Preparer check if self-employed Preparer's PTIN P00645252
Firm's name (or yours if self-employed) and address: PLANTE & MORAN, PLLC 2601 CAMBRIDGE CT., STE. 300 AUBURN HILLS, MI FEIN 38-1357951 ZIP 48326

All Taxpayers Must Answer Questions A through L Below - See Instructions

- A. State of incorporation: MICHIGAN
B. Florida Secretary of State document number:
C. Florida consolidated return? YES NO X
D. Initial return Final return (final federal return filed)
E. Principal Business Activity Code (as pertains to Florida) 211100
F. A Florida extension of time was timely filed? YES X NO
G-1. Corporation is a member of a controlled group? YES NO X If yes, attach list.
G-2. Part of a federal consolidated return? YES NO X If yes, provide: FEIN from federal consolidated return: Name of corporation:
G-3. The federal common parent has sales, property, or payroll in Florida? YES NO X
H. Location of corporate books: TWO TOWNE SQUARE #900 SOUTHFIELD, MI 48076
I. Taxpayer is a member of a Florida partnership or joint venture? YES X NO
J. Enter date of latest IRS audit:
a) List years examined:
K. Contact person concerning this return: DOUGLAS STEWART
a) Contact person telephone number: 248-415-1444
b) Contact person e-mail address: DSTEWART@MMFISHER.OR
L. Type of federal return filed 1120 1120S or 990-T



Online Information Reporting Requirement

Visit the Department website to obtain a list of the required information, due date, penalty rate and application to enter the information. (See section 220.27, Florida Statutes)

Where to Send Payments and Returns

Make check payable to and mail with return to:
Florida Department of Revenue
5050 W Tennessee Street
Tallahassee FL 32399-0135

If you are requesting a refund (Line 19), send your return to:
Florida Department of Revenue
PO Box 6440
Tallahassee FL 32314-6440

Remember:
- Make your check payable to the Florida Department of Revenue.
- Write your FEIN on your check.
- Sign your check and return.
- Attach a copy of your federal return.
- Attach a copy of your Florida Form F-7004 (extension of time) if applicable.



NAME MAX M. & MARJORIE S. FISHER FOUNDATIO FEIN 38-1784340 TAXABLE YEAR ENDING 12/31/22

| Schedule I - Additions and/or Adjustments to Federal Taxable Income | |
|---|-----|
| 1. Interest excluded from federal taxable income (see instructions) | 1. |
| 2. Undistributed net long-term capital gains (see instructions) | 2. |
| 3. Net operating loss deduction (attach schedule) | 3. |
| 4. Net capital loss carryover (attach schedule) | 4. |
| 5. Excess charitable contribution carryover (attach schedule) | 5. |
| 6. Employee benefit plan contribution carryover (attach schedule) | 6. |
| 7. Enterprise zone jobs credit (Florida Form F-1156Z) | 7. |
| 8. Ad valorem taxes allowable as an enterprise zone property tax credit (Florida Form F-1158Z) | 8. |
| 9. Guaranty association assessment(s) credit | 9. |
| 10. Rural and/or urban high-crime area job tax credits | 10. |
| 11. State housing tax credit | 11. |
| 12. Florida tax credit scholarship program credit (credit for contributions to nonprofit scholarship-funding organizations) | 12. |
| 13. New worlds reading initiative credit | 13. |
| 14. Strong families tax credit (credit for contributions to eligible charitable organizations) | 14. |
| 15. New markets tax credit | 15. |
| 16. Entertainment industry tax credit | 16. |
| 17. Research and development tax credit | 17. |
| 18. Energy economic zone tax credit | 18. |
| 19. s. 168(k), IRC, special bonus depreciation | 19. |
| 20. Depreciation of qualified improvement property (see instructions) | 20. |
| 21. Expenses for business meals provided by a restaurant (see instructions) | 21. |
| 22. Film, television, and live theatrical production expenses (see instructions) | 22. |
| 23. Internship tax credit | 23. |
| 24. Other additions (attach schedule) | 24. |
| 25. Total Lines 1 through 24. Enter total on this line and on Page 1, Line 3. | 25. |

| Schedule II - Subtractions from Federal Taxable Income | |
|---|----------------|
| 1. Gross foreign source income less attributable expenses (a) Enter s. 78, IRC, income \$ _____ (b) plus s. 862, IRC, dividends \$ _____ (c) plus s. 951A, IRC, income \$ _____ (d) less direct and indirect expenses and related amounts deducted under s. 250, IRC \$ _____ | 1. |
| 2. Gross subpart F income less attributable expenses (a) Enter s. 951, IRC, subpart F income \$ _____ (b) less direct and indirect expenses \$ _____ | 2. |
| Note: Taxpayers doing business outside Florida enter zero on Lines 3 through 6, and complete Schedule IV. | |
| 3. Florida net operating loss carryover deduction (see instructions) STATEMENT 2 | 3. |
| 4. Florida net capital loss carryover deduction (see instructions) | 4. |
| 5. Florida excess charitable contribution carryover (see instructions) | 5. |
| 6. Florida employee benefit plan contribution carryover (see instructions) | 6. |
| 7. Nonbusiness income (from Schedule R, Line 3) | 7. |
| 8. Eligible net income of an international banking facility (see instructions) | 8. |
| 9. s. 168(k), IRC, special bonus depreciation (see instructions) | 9. |
| 10. Depreciation of qualified improvement property (see instructions) | 10. |
| 11. Film, television, and live theatrical production expenses (see instructions) | 11. |
| 12. Other subtractions (attach schedule) STATEMENT 1 | 12. 121,385.00 |
| 13. Total Lines 1 through 12. Enter total on this line and on Page 1, Line 5. | 13. 121,385.00 |



NAME MAX M. & MARJORIE S. FISHER FOUNDATIO FEIN 38-1784340 TAXABLE YEAR ENDING 12/31/22

| Schedule III - Apportionment of Adjusted Federal Income | | | | | |
|--|--------------------------------------|--|--|--|---|
| III-A For use by taxpayers doing business outside Florida, except those providing insurance or transportation services. | | | | | |
| | (a) WITHIN FLORIDA (Numerator) | (b) TOTAL EVERYWHERE (Denominator) | (c) Col. (a) ÷ Col. (b) Rounded to Six Decimal Places | (d) Weight <small>If any factor in Column (b) is zero, see note on Pg 9 of the instructions.</small> | (e) Weighted Factors Rounded to Six Decimal Places |
| 1. Property (Schedule III-B below) | | | | X 25% or | |
| 2. Payroll | | | | X 25% or | |
| 3. Sales (Schedule III-C below) | | | | X 50% or | |
| 4. Apportionment fraction (Sum of Lines 1, 2, and 3, Column (e)). Enter here and on Schedule IV, Line 2. | | | | | 1.000000 |
| III-B For use in computing average value of property (use original cost). | | WITHIN FLORIDA | | TOTAL EVERYWHERE | |
| | | a. Beginning of year | b. End of year | c. Beginning of year | d. End of year |
| 1. Inventories of raw material, work in process, finished goods | | | | | |
| 2. Buildings and other depreciable assets | | | | | |
| 3. Land owned | | | | | |
| 4. Other tangible and intangible (financial org. only) assets (attach schedule) | | | | | |
| 5. Total (Lines 1 through 4) | | | | | |
| 6. Average value of property | | | | | |
| a. Add Line 5, Columns (a) and (b) and divide by 2 (for within Florida) | | 6a. _____ | | | |
| b. Add Line 5, Columns (c) and (d) and divide by 2 (for total everywhere) | | 6b. _____ | | | |
| 7. Rented property (8 times net annual rent) | | | | | |
| a. Rented property in Florida | | 7a. _____ | | | |
| b. Rented property Everywhere | | 7b. _____ | | | |
| 8. Total (Lines 6 and 7). Enter on Line 1, Schedule III-A, Columns (a) and (b). | | | | | |
| a. Enter Lines 6 a. plus 7 a. and also enter on Schedule III-A, Line 1, Column (a) for total average property in Florida | | 8a. _____ | | | |
| b. Enter Lines 6 b. plus 7 b. and also enter on Schedule III-A, Line 1, Column (b) for total average property Everywhere | | 8b. _____ | | | |
| III-C Sales Factor | | | (a) TOTAL WITHIN FLORIDA (Numerator) | (b) TOTAL EVERYWHERE (Denominator) | |
| 1. Sales (gross receipts) | | | N/A | | |
| 2. Sales delivered or shipped to Florida purchasers | | | | N/A | |
| 3. Other gross receipts (rents, royalties, interest, etc. when applicable) | | | | | |
| 4. TOTAL SALES (Enter on Schedule III-A, Line 3, Columns [a] and [b]) | | | | | |
| III-D Special Apportionment Fractions (see instructions) | | | (a) WITHIN FLORIDA | (b) TOTAL EVERYWHERE | (c) FLORIDA Fraction ([a] ÷ [b]) Rounded to Six Decimal Places |
| 1. Insurance companies (attach copy of Schedule T - Annual Report) | | | | | |
| 2. Transportation services | | | | | |

| Schedule IV - Computation of Florida Portion of Adjusted Federal Income | |
|--|----|
| 1. Apportionable adjusted federal income from Page 1, Line 6 | 1. |
| 2. Florida apportionment fraction (Schedule III-A, Line 4) | 2. |
| 3. Tentative apportioned adjusted federal income (multiply Line 1 by Line 2) | 3. |
| 4. Net operating loss carryover apportioned to Florida (attach schedule; see instructions) | 4. |
| 5. Net capital loss carryover apportioned to Florida (attach schedule; see instructions) | 5. |
| 6. Excess charitable contribution carryover apportioned to Florida (attach schedule; see instructions) | 6. |
| 7. Employee benefit plan contribution carryover apportioned to Florida (attach schedule; see instructions) | 7. |
| 8. Total carryovers apportioned to Florida (add Lines 4 through 7) | 8. |
| 9. Adjusted federal income apportioned to Florida (Line 3 less Line 8; see instructions) | 9. |



NAME MAX M. & MARJORIE S. FISHER FOUNDATIO FEIN 38-1784340 TAXABLE YEAR ENDING 12/31/22

| Schedule V - Credits Against the Corporate Income/Franchise Tax | |
|--|-----|
| 1. Florida health maintenance organization consumer assistance assessment credit (attach assessment notice) | 1. |
| 2. Capital investment tax credit (attach certification letter) | 2. |
| 3. Enterprise zone jobs credit (from Florida Form F-1156Z attached) | 3. |
| 4. Community contribution tax credit (attach certification letter) | 4. |
| 5. Enterprise zone property tax credit (from Florida Form F-1158Z attached) | 5. |
| 6. Rural job tax credit (attach certification letter) | 6. |
| 7. Urban high-crime area job tax credit (attach certification letter) | 7. |
| 8. Hazardous waste facility tax credit | 8. |
| 9. Florida alternative minimum tax (AMT) credit | 9. |
| 10. Contaminated site rehabilitation tax credit (voluntary cleanup tax credit) (attach tax credit certificate) | 10. |
| 11. State housing tax credit (attach certification letter) | 11. |
| 12. Florida tax credit scholarship program credit (credit for contributions to nonprofit scholarship-funding organizations) (attach certificate) | 12. |
| 13. New worlds reading initiative credit (attach certificate) | 13. |
| 14. Strong families tax credit (credit for contributions to eligible charitable organizations) (attach certificate) | 14. |
| 15. New markets tax credit | 15. |
| 16. Entertainment industry tax credit | 16. |
| 17. Research and development tax credit | 17. |
| 18. Energy economic zone tax credit | 18. |
| 19. Internship tax credit | 19. |
| 20. Other credits (attach schedule) | 20. |
| 21. Total credits against the tax (sum of Lines 1 through 20 not to exceed the amount on Page 1, Line 11). Enter total credits on Page 1, Line 12 | 21. |

Schedule R - Nonbusiness Income

Line 1. Nonbusiness income (loss) allocated to Florida

| <u>Type</u> | <u>Amount</u> |
|-------------------------------------|---------------|
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |
| Total allocated to Florida 1. | _____ |
| (Enter here and on Page 1, Line 8) | |

Line 2. Nonbusiness income (loss) allocated elsewhere

| <u>Type</u> | <u>State/country allocated to</u> | <u>Amount</u> |
|------------------------------------|-----------------------------------|---------------|
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| Total allocated elsewhere 2. | | _____ |

Line 3. Total nonbusiness income

| | |
|--|-------|
| Grand total. Total of Lines 1 and 2 3. | _____ |
| (Enter here and on Schedule II, Line 7) | |



NAME MAX M. & MARJORIE S. FISHER FOUNDATIO FEIN 38-1784340 TAXABLE YEAR ENDING 12/31/22

**Estimated Tax Worksheet
For Taxable Years Beginning On or After January 1,**

| | | | |
|--|-----|----|------------------|
| 1. Florida income expected in taxable year | 1. | \$ | <u>-4,615.00</u> |
| 2. Florida exemption \$50,000 (Members of a controlled group, see instructions on Page 14 of Florida Form F-1120N) | 2. | \$ | _____ |
| 3. Estimated Florida net income (Line 1 less Line 2) | 3. | \$ | _____ |
| 4. Total Estimated Florida tax (5.5% of Line 3) | | \$ | _____ |
| Less: Credits against the tax | 4. | \$ | _____ |
| 5. Computation of installments: | | | |
| Payment due dates and | | | |
| payment amounts: | | | |
| If 6/30 year end, last day of 4th month, | | | |
| otherwise last day of 5th month - Enter 0.25 of Line 4 | 5a. | | _____ |
| Last day of 6th month - Enter 0.25 of Line 4 | 5b. | | _____ |
| Last day of 9th month - Enter 0.25 of Line 4 | 5c. | | _____ |
| Last day of fiscal year - Enter 0.25 of Line 4 | 5d. | | _____ |

NOTE: If your estimated tax should change during the year, you may use the amended computation below to determine the amended amounts to be entered on the declaration (Florida Form F-1120ES).

| | | | |
|---|-----|----|-------|
| 1. Amended estimated tax | 1. | \$ | _____ |
| 2. Less: | | | |
| (a) Amount of overpayment from last year elected for credit | | | |
| to estimated tax and applied to date | 2a. | \$ | _____ |
| (b) Payments made on estimated tax declaration (Florida Form F-1120ES) | 2b. | \$ | _____ |
| (c) Total of Lines 2(a) and 2(b) | 2c. | \$ | _____ |
| 3. Unpaid balance (Line 1 less Line 2(c)) | 3. | \$ | _____ |
| 4. Amount to be paid (Line 3 divided by number of remaining installments) | 4. | \$ | _____ |

References

*The following documents were mentioned in this form and are incorporated by reference in the rules indicated below.
The forms are available online at floridarevenue.com/forms.*

| | | |
|---------------|--|------------------------|
| Form F-2220 | Underpayment of Estimated Tax on Florida Corporate Income/Franchise Tax | Rule 12C-1.051, F.A.C. |
| Form F-7004 | Florida Tentative Income/Franchise Tax Return and Application for Extension of Time to File Return | Rule 12C-1.051, F.A.C. |
| Form F-1156Z | Florida Enterprise Zone Jobs Credit Certificate of Eligibility for Corporate Income Tax | Rule 12C-1.051, F.A.C. |
| Form F-1158Z | Enterprise Zone Property Tax Credit | Rule 12C-1.051, F.A.C. |
| Form F-1120N | Instructions for Corporate Income/Franchise Tax Return | Rule 12C-1.051, F.A.C. |
| Form F-1120ES | Declaration/Installment of Florida Estimated Income/Franchise Tax | Rule 12C-1.051, F.A.C. |

MAX M. & MARJORIE S. FISHER FOUNDATION,

38-1784340

FL F-1120

OTHER SUBTRACTIONS

STATEMENT 1

DESCRIPTION

AMOUNT

INCOME ALLOCABLE TO OTHER STATES

121,385.00

TOTAL TO FORM F-1120, SCHEDULE II, LINE 12

121,385.00

FL F-1120

NET OPERATING LOSS CARRYOVERS

STATEMENT 2

| YEAR | APPORZION FACTOR | CURRENT YR NOL/ SECTION 382 LIMIT | NET OPERATING LOSS CARRYOVER | LOSS PREVIOUSLY DEDUCTED | NET LOSS REMAINING |
|--|---------------------|---|---------------------------------|-----------------------------|-----------------------|
| 2019 | 0% | 0. | 3,615. | 0. | 3,615.00 |
| 2020 | 0% | 0. | 3,995. | 0. | 3,995.00 |
| 2021 | 0% | 0. | 1,894. | 0. | 1,894.00 |
| TOTAL NET OPERATING LOSS CARRYOVER AVAILABLE | | | | | 9,504.00 |



MAX M. & MARJORIE S. FISHER FOUNDATION,

1019
F-1120
R. 01/23

FEIN 38-1784340

DATA Page 1 of 2

| | | | |
|-----------|---|---|----------|
| 381784340 | 0 | 0 | 0 |
| 11677000 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 12138500 |
| 2 | 0 | 0 | 0 |
| 2 | 0 | 0 | 0 |
| 2 | 0 | 0 | 0 |
| 1 | 0 | 0 | 0 |
| 00000000 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 1.000000 |

Electronic Filing PDF Attachment

MAX M. & MARJORIE S. FISHER FOUNDATION

Non-unitary partnership business income or loss allocable to California FEIN: 38-1784340

For the Tax Year 2022

| | FEIN Total | Withholding | |
|-------------------------------|-------------------|--------------------|----------|
| Blackstone RE Partners V | 20-3799172 | 3,274 | - |
| BREP VII.F (AV-LH.4) | 30-0746590 | 461 | - |
| BREP VII.F NQ (AV-LH.3) | 32-0384657 | 6,307 | - |
| Sculptor RE Parallel Fd III-A | 80-0961650 | (247) | - |
| BREP VIII.F (AV-LH) | 47-3861773 | (106) | - |
| BREP VIII.F (AV-LH.4) | 82-3091815 | 1,304 | - |
| BREP VIII.F NQ (AV-LH) | 47-3845317 | 383 | - |
| BREP VIII.F-NQ (AV-LH.2) | 81-3401726 | (3,555) | - |
| BREP VIII.F-NQ (AV-LH.4) | 84-2605874 | 291 | - |
| Total FLORIDA UBTI | | 8,112 | - |

STATEMENT 1

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

Department of the Treasury
Internal Revenue Service

▶ **File a separate application for each return.**
▶ **Go to www.irs.gov/Form8868 for the latest information.**

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

| | | |
|--|--|---|
| Type or print | Name of exempt organization or other filer, see instructions. MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Taxpayer identification number (TIN) 38-1784340 |
| File by the due date for filing your return. See instructions. | Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | |
| | City, town or post office, state, and ZIP code. For a foreign address, see instructions. SOUTHFIELD, MI 48076 | |

Enter the Return Code for the return that this application is for (file a separate application for each return) 0 4

| Application Is For | Return Code | Application Is For | Return Code |
|--|-------------|-----------------------------------|-------------|
| Form 990 or Form 990-EZ | 01 | Form 1041-A | 08 |
| Form 4720 (individual) | 03 | Form 4720 (other than individual) | 09 |
| Form 990-PF | 04 | Form 5227 | 10 |
| Form 990-T (sec. 401(a) or 408(a) trust) | 05 | Form 6069 | 11 |
| Form 990-T (trust other than above) | 06 | Form 8870 | 12 |
| Form 990-T (corporation) | 07 | | |

EMILY DIEGEL

- The books are in the care of ▶ **TWO TOWNE SQUARE #900 - SOUTHFIELD, MI 48076**

Telephone No. ▶ **248-415-1440** Fax No. ▶ _____

- If the organization does not have an office or place of business in the United States, check this box
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) _____. If this is for the whole group, check this box . If it is for part of the group, check this box and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6-month extension of time until **NOVEMBER 15, 2023**, to file the exempt organization return for the organization named above. The extension is for the organization's return for:

- ▶ calendar year **2022** or
- ▶ tax year beginning _____, and ending _____.

2 If the tax year entered in line 1 is for less than 12 months, check reason: Initial return Final return Change in accounting period

| | | | |
|---|-----------|----|----------|
| 3a If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions. | 3a | \$ | 310,000. |
| b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. | 3b | \$ | 150,000. |
| c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions. | 3c | \$ | 160,000. |

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.

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

Department of the Treasury
Internal Revenue Service

▶ **File a separate application for each return.**
▶ **Go to www.irs.gov/Form8868 for the latest information.**

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

| | | |
|--|--|---|
| Type or print | Name of exempt organization or other filer, see instructions. MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Taxpayer identification number (TIN) 38-1784340 |
| File by the due date for filing your return. See instructions. | Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | |
| | City, town or post office, state, and ZIP code. For a foreign address, see instructions. SOUTHFIELD, MI 48076 | |

Enter the Return Code for the return that this application is for (file a separate application for each return) 0 7

| Application Is For | Return Code | Application Is For | Return Code |
|--|-------------|-----------------------------------|-------------|
| Form 990 or Form 990-EZ | 01 | Form 1041-A | 08 |
| Form 4720 (individual) | 03 | Form 4720 (other than individual) | 09 |
| Form 990-PF | 04 | Form 5227 | 10 |
| Form 990-T (sec. 401(a) or 408(a) trust) | 05 | Form 6069 | 11 |
| Form 990-T (trust other than above) | 06 | Form 8870 | 12 |
| Form 990-T (corporation) | 07 | | |

EMILY DIEGEL

- The books are in the care of ▶ **TWO TOWNE SQUARE #900 - SOUTHFIELD, MI 48076**

Telephone No. ▶ **248-415-1440** Fax No. ▶ _____

- If the organization does not have an office or place of business in the United States, check this box
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) _____. If this is for the whole group, check this box . If it is for part of the group, check this box and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6-month extension of time until **NOVEMBER 15, 2023**, to file the exempt organization return for the organization named above. The extension is for the organization's return for:

- ▶ calendar year **2022** or
- ▶ tax year beginning _____, and ending _____.

2 If the tax year entered in line 1 is for less than 12 months, check reason: Initial return Final return Change in accounting period

| | | |
|---|-----------|--------------------|
| 3a If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions. | 3a | \$ 0. |
| b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. | 3b | \$ 125,000. |
| c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions. | 3c | \$ 0. |

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.

**Florida Tentative Income / Franchise Tax Return
and Application for Extension of Time to File Return**

1019
F-7004
R. 01/17
Rule 12C-1.051
Florida Administrative Code
Effective 01/17

Information for Filing Florida Form F-7004

F-7004
R. 01/17

When to file - File this application on or before the original due date of the taxpayer's corporate income tax or partnership return. Do not file before the end of the tax year.

To file online go to www.floridarevenue.com

Penalties - If you are required to pay tax with this application, failure to pay will void any extension of time and subject the taxpayer to penalties and interest. There is also a penalty for late-file return when no tax is due.

Signature - A person authorized by the taxpayer must sign Florida Form F-7004. They must be an officer or partner of the taxpayer; a person currently enrolled to practice before the Internal Revenue Service (IRS); or attorney or Certified Public Accountant qualified to practice before the IRS under Public Law 89-332.

The Florida Form F-7004 must be filed - To receive an extension of time to file your Florida return, Florida Form F-7004 must be timely filed, even if you have already filed a federal extension request. A federal extension by itself does not extend the time to file a Florida return.

An extension for Florida tax purposes may be granted, even though no federal extension was granted. See Rule 12C-1.0222, F.A.C., for information on the requirements that must be met for your request for an extension of time to be valid.

A. If applicable, state the reason you need the extension:

B. Type of federal return filed: 990-T
 Contact person for questions: DOUGLAS STEWART
 Telephone number: 248-415-1444
 Contact Person email address: DSTEWART@MMFISHER.OR

| Extension of Time Request | Florida Income/Franchise Tax Due |
|---|----------------------------------|
| 1. Tentative amount of Florida tax for the taxable year | 1. 0.00 |
| 2. LESS: Estimated tax payments for the taxable year | 2. 6,221.00 |
| 3. Balance due - You must pay 100% of the tax tentatively determined due with this extension request. | 3. 0.00 |

Transfer the amount on Line 3 to **Tentative tax due** .

Make checks payable and mail to:

FLORIDA DEPARTMENT OF REVENUE, 5050 W TENNESSEE STREET, TALLAHASSEE FL 32399-0135

244961
10-04-22

**Florida Department of Revenue - Corporate Income Tax
Florida Tentative Income / Franchise Tax Return
and Application for Extension of Time to File Return**

1019
F-7004
R. 01/17

Name MAX M. & MARJORIE S. FISHER FOUNDATION, INC.
Address TWO TOWNE SQUARE
City/State/ZIP SOUTHFIELD, MI 48076

FEIN 38-1784340
 Taxable Year End 12/31/22
 FILING STATUS Partnership S-corporation
 All other federal returns to be filed X
 Tentative Tax Due \$ 0.00

Under penalties of perjury, I declare that I have been authorized by the above named taxpayer to make this application, that to the best of my knowledge and belief the statements herein are true and correct:

Sign Here: _____ Date: _____

| | | | |
|-----------|---|---|---|
| 381784340 | 0 | 0 | 0 |
| 3 | 0 | 0 | 0 |
| 20221231 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 012 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |
| 0 | 0 | 0 | 0 |

TAX RETURN FILING INSTRUCTIONS

NEW YORK FORM CT-13

FOR THE YEAR ENDING
DECEMBER 31, 2022

PREPARED FOR:

MS. EMILY DIEGEL
MAX M. & MARJORIE S. FISHER FOUNDATION
TWO TOWNE SQUARE 900
SOUTHFIELD, MI 48076

PREPARED BY:

PLANTE & MORAN, PLLC
2601 CAMBRIDGE CT., STE. 300
AUBURN HILLS, MI 48326

TO BE SIGNED AND DATED BY:

NOT APPLICABLE

AMOUNT OF TAX:

| | | |
|------------------------------|----|-------|
| TOTAL TAX | \$ | 250 |
| LESS: PAYMENTS AND CREDITS | \$ | 4,386 |
| PLUS: OTHER AMOUNT | | 0 |
| PLUS: INTEREST AND PENALTIES | \$ | 0 |
| OVERPAYMENT | \$ | 4,136 |

OVERPAYMENT:

| | | |
|--------------------------------|----|-------|
| CREDITED TO YOUR ESTIMATED TAX | \$ | 4,136 |
| OTHER AMOUNT | \$ | 0 |
| REFUNDED TO YOU | \$ | 0 |

MAKE CHECK PAYABLE TO:

NOT APPLICABLE

MAIL TAX RETURN AND CHECK (IF APPLICABLE) TO:

THIS RETURN HAS QUALIFIED FOR ELECTRONIC FILING. AFTER YOU HAVE REVIEWED THE RETURN FOR COMPLETENESS AND ACCURACY, PLEASE SIGN, DATE AND RETURN FORM TR-579-CT TO OUR OFFICE. WE WILL THEN TRANSMIT YOUR RETURN ELECTRONICALLY TO THE NYSDTF. DO NOT MAIL THE PAPER COPY OF THE RETURN TO THE NYSDTF.

RETURN MUST BE MAILED ON OR BEFORE:

RETURN FORM TR-579-CT TO US BY NOVEMBER 15, 2023.

SPECIAL INSTRUCTIONS:



New York State E-File Authorization for Tax Year 2022

TR-579-CT

For Certain Corporation Tax Returns and Estimated Tax Payments for Corporations

(9/22)

Electronic return originator (ERO)/paid preparer: **Do not** mail this form to the Tax Department. Keep it for your records.

Legal name of corporation **MAX M. & MARJORIE S. FISHER FOUNDATION,**

Return type (mark an X for all that apply): CT-3 CT-3-A CT-3-M CT-3-S CT-13 CT-33
 CT-33-A CT-33-C CT-33-M CT-33-NL CT-183 CT-183-M CT-184 CT-184-M
 CT-186-E CT-300 CT-400

Purpose

Form TR-579-CT must be completed to authorize an ERO to e-file a corporation tax return and to transmit bank account information for the electronic funds withdrawal.

General instructions

Part A must be completed by an officer of the corporation who is authorized to sign the corporation's return before the ERO transmits the electronically filed Form CT-3, *General Business Corporation Franchise Tax Return*; CT-3-A, *General Business Corporation Combined Franchise Tax Return*; CT-3-M, *General Business Corporation MTA Surcharge Return*; CT-3-S, *New York S Corporation Franchise Tax Return*; CT-13, *Unrelated Business Income Tax Return*; CT-33, *Life Insurance Corporation Franchise Tax Return*; CT-33-A, *Life Insurance Corporation Combined Franchise Tax Return*; CT-33-C, *Captive Insurance Company Franchise Tax Return*; CT-33-M, *Insurance Corporation MTA Surcharge Return*; CT-33-NL, *Non-Life Insurance Corporation Franchise Tax Return*; CT-183, *Transportation and Transmission Corporation Franchise Tax Return on Capital Stock*; CT-183-M, *Transportation and Transmission Corporation MTA Surcharge Return*; CT-184, *Transportation and Transmission Corporation Franchise Tax Return on Gross Earnings*; CT-184-M, *Transportation and Transmission Corporation MTA Surcharge Return*; CT-186-E, *Telecommunications Tax Return and Utility Services Tax Return*; CT-300, *Mandatory First Installment (MFI) of Estimated Tax for Corporations*; or CT-400, *Estimated Tax for Corporations*.

EROs/paid preparers must complete Part B prior to transmitting electronically filed corporation tax returns. Both the paid preparer and the ERO are required to sign Part B. However, if an individual performs as both the paid preparer and the ERO, he or she is only required to sign as the paid preparer. It is not necessary to include the ERO signature in this case. Note that an electronic signature can be used as described in TSB-M-20(1)C, (2)I, *E-File Authorizations (TR-579 forms) for Taxpayers Using a Paid Preparer for Electronically Filed Tax Returns*. Go to our website at www.tax.ny.gov to find this document.

Do not mail this form to the Tax Department. EROs/paid preparers must keep this form for three years and present it to the Tax Department upon request.

Do not use this form for electronically filed Form CT-5, *Request for Six-Month Extension to File (for franchise/business taxes, MTA surcharge, or both)*; CT-5.3, *Request for Six-Month Extension to File (for combined franchise tax return, or combined MTA surcharge return, or both)*; CT-5.4, *Request for Six-Month Extension to File New York S Corporation Franchise Tax Return*; CT-5.6, *Request for Three-Month Extension to File Form CT-186 (for utility corporation franchise tax return, MTA surcharge return, or both)*; CT-5.9, *Request for Three-Month Extension to File (for certain Article 9 tax returns, MTA surcharge, or both)*; or CT-5.9-E, *Request for Three-Month Extension to File Form CT-186-E (for telecommunications tax return and utility services tax return)*. Instead use Form TR-579-1-CT, *New York State Authorization for Electronic Funds Withdrawal For Tax Year 2022 Corporation Tax Extensions*.

Financial institution information (required if electronic payment is authorized)

- 1 Amount of authorized debit
- 2 Financial institution routing number
- 3 Financial institution account number

| | |
|---|--|
| 1 | |
| 2 | |
| 3 | |

Part A - Declaration of authorized corporate officer for Form CT-3, CT-3-A, CT-3-M, CT-3-S, CT-13, CT-33, CT-33-A, CT-33-C, CT-33-M, CT-33-NL, CT-183, CT-183-M, CT-184, CT-184-M, CT-186-E, CT-300, or CT-400

Under penalty of perjury, I declare that I have examined the information on this 2022 New York State electronic corporate tax return, including any accompanying schedules, attachments, and statements, and certify that this electronic return is true, correct, and complete. If this filing includes Form DTF-686, *Tax Shelter Reportable Transactions*, as an authorized officer of the corporation, I hereby consent to the waiver of the secrecy provisions of Tax Law sections 202, 211.8, 1467, and 1518 as such provisions relate to the disclosure requirements of Tax Law section 25. The ERO has my consent to send this 2022 New York State electronic corporate return to New York State through the Internal Revenue Service (IRS). I understand that by executing this Form TR-579-CT, I am authorizing the ERO to sign and file this return on behalf of the corporation and agree that the ERO's submission of the corporation's return to the IRS, together with this authorization, will serve as the electronic signature for the return and any authorized payment transaction. If I am paying New York State corporation taxes due by electronic funds withdrawal, I authorize the New York State Tax Department and its designated financial agents to initiate an electronic funds withdrawal from the financial institution account indicated on this 2022 electronic return, and I authorize the financial institution to withdraw the amount from the account. As New York does not support International ACH Transactions (IAT), I attest the source for these funds is within the United States. I understand and agree that I may revoke this authorization for payment only by contacting the Tax Department no later than two business days prior to the payment date.

| | | |
|--|---|-------------------------|
| Signature of authorized officer of the corporation | Print your name and title DOUGLAS STEWART, EXECUTIVE DIRECTOR | Date 11-15-23 |
|--|---|-------------------------|

Part B - Declaration of ERO and paid preparer

Under penalty of perjury, I declare that the information contained in this 2022 New York State electronic corporate tax return is the information furnished to me by the corporation. If the corporation furnished me a completed paper 2022 New York State corporate tax return signed by a paid preparer, I declare that the information contained in the corporation's 2022 New York State electronic corporate tax return is identical to that contained in the paper return. If I am the paid preparer, under penalty of perjury I declare that I have examined this 2022 New York State electronic corporate tax return, and, to the best of my knowledge and belief, the return is true, correct, and complete. I have based this declaration on all information available to me.

| | | |
|--|---|-------------------------|
| ERO's signature PLANTE & MORAN, PLLC | Print name PLANTE & MORAN, PLLC | Date 11-08-23 |
| Paid preparer's signature DORI J. EGGETT | Print name DORI J. EGGETT | Date 11-08-23 |



CT-2

Department of Taxation and Finance

Corporation Tax Return Summary

THIS FORM MUST BE FILED WITH YOUR RETURN

1 Legal name of corporation

1. MAX M. & MARJORIE S. FISHER FOUNDATIO INC.

Payment enclosed

2.

3 Return type

3. CT13

4 Employer ID number (EIN)

4. 38-1784340

5 File number (FCC)

5. MM1

6 Period beginning date (mm-dd-yy)

6. 01-01-22

7 Period ending date (mm-dd-yy)

7. 12-31-22

8 Amended (Y=1; N=0)

8. 0

9 Final (Y=1; N=0)

9.

10 NAICS code

10. 211100

11 MTA indicator (None = 0; Y = 1; N = 2; Both = 3)

11.

12 Federal 1120-H filed (Y = 1; N = 0)

12.

13 REIT/RIC indicator (Y=1; N=0)

13.

14 Tax due/MTA surcharge

14. 250.00

15 Mandatory first installment (MFI) - no extension filed and tax due is over \$1,000

15.

16 Balance due

16.

17 Amount of overpayment credited to next period - NYS

17. 4,136.00

18 Refund of overpayment

18.

19 Refund of unused tax credits

19.

20 Tax credits to be credited as an overpayment to next year's return

20.

21 Amount of overpayment credited to next period - MTA

21.

22 Amount of MTA surcharge retaliatory tax credit to be refunded

22.

23 Fixed dollar minimum

23.

24 Designated agent's (Article 9-A) or combined parent's (Article 33) EIN

24. -

25 New York receipts

25.

26 Have you been convicted of an offense (NYS Penal Law, Art. 200 or 496, or section 195.20)?

26.

27 Paid preparer's EIN

27. 38-1357951

28 Preparer's NYTPRIN

28.

29 Excl. code

29. 03

541001221019



284951 11-16-22 1019

For office use only

Form CT-186-E filers only

| | | | | |
|----|--|-----|----------------------|----------------------|
| 30 | Excise tax on telecommunication services - NYS | 30. | <input type="text"/> | <input type="text"/> |
| 31 | Excise tax on mobile telecommunication services subject to the 2.9% rate | 31. | <input type="text"/> | <input type="text"/> |
| 32 | Total excise tax on telecommunication services | 32. | <input type="text"/> | <input type="text"/> |
| 33 | Tax on gross income - NYS | 33. | <input type="text"/> | <input type="text"/> |
| 34 | MTA surcharge related to telecommunication services | 34. | <input type="text"/> | <input type="text"/> |
| 35 | MTA surcharge related to telecommunication services subject to the 0.721% tax rate | 35. | <input type="text"/> | <input type="text"/> |
| 36 | Total MTA surcharge related to telecommunication services | 36. | <input type="text"/> | <input type="text"/> |
| 37 | MTA surcharge on gross income | 37. | <input type="text"/> | <input type="text"/> |
| 38 | Balance due - NYS | 38. | <input type="text"/> | <input type="text"/> |
| 39 | Balance due - MTA | 39. | <input type="text"/> | <input type="text"/> |
| 40 | Provided telecommunication services in the MCTD this year? (None = 0; Y = 1; N = 2; Both = 3) | 40. | <input type="text"/> | <input type="text"/> |
| 41 | Subject to supervision of the Department of Public Service and provided utility services in the MCTD this year? (None = 0; Y = 1; N = 2; Both = 3) | 41. | <input type="text"/> | <input type="text"/> |
| 42 | Overpayment credited to next year's tax - NYS | 42. | <input type="text"/> | <input type="text"/> |
| 43 | Overpayment credited to next year's tax - MTA | 43. | <input type="text"/> | <input type="text"/> |
| 44 | Refund of overpayment - NYS | 44. | <input type="text"/> | <input type="text"/> |
| 45 | Refund of overpayment - MTA | 45. | <input type="text"/> | <input type="text"/> |
| 46 | Refund of unused tax credits - NYS | 46. | <input type="text"/> | <input type="text"/> |
| 47 | Refund of unused tax credits - MTA | 47. | <input type="text"/> | <input type="text"/> |
| 48 | Refundable tax credits to be credited to next year's tax - NYS | 48. | <input type="text"/> | <input type="text"/> |
| 49 | Refundable tax credits to be credited to next year's tax - MTA | 49. | <input type="text"/> | <input type="text"/> |

541002221019





CT-13

Department of Taxation and Finance

Unrelated Business Income Tax Return

All filers enter tax period:

beginning **01-01-22** ending **12-31-22**

Recommended return

Tax Law - Article 13

| | | | |
|---|--|--|---|
| Employer identification number (EIN) 38-1784340 | File number MM1 | Business telephone number 248-415-4000 | If you claim an overpayment, mark an X in the box <input checked="" type="checkbox"/> |
| Legal name of corporation MAX M. & MARJORIE S. FISHER FOUNDA | | Trade name/DBA | |
| INC. | | | |
| Mailing address | | State or country of incorporation | |
| Care of (c/o) | | | |
| Number and street or PO Box TWO TOWNE SQUARE, 900 | | Date of incorporation | Foreign corporations: date began business in NYS |
| City SOUTHFIELD, MI | U.S. state/Canadian province MI | ZIP/Postal code 48076 | Country (if not United States) |
| NAICS business code number (from federal return) 211100 | If you need to update your address or phone information for corporation tax, or other tax types, you can do so online. See <i>Business information</i> in Form CT-1. | | |
| Principal unrelated business activity (see instructions) PARTNERSHIP INCOME | | | |

Form CT-247, Application for Exemption from Corporation Franchise Taxes by a Not-For-Profit

Organization - Have you filed this New York State application for exemption? (see instructions) Yes No

Mark an X in this box if you are an employee trust as defined in Internal Revenue Code (IRC) section 401(a)

Mark an X in this box if you ceased operating the unrelated business during the tax year covered by this return (see section Who must file Form CT-13 in the instructions)

| | |
|---|------------------|
| A. Pay amount shown on line 22. Make payable to: <i>New York State Corporation Tax</i> | Payment enclosed |
| ◀ Attach your payment here. Detach all check stubs. (See instructions for details.) | A |

Computation of income and tax

| | | | |
|----|---|----|----------|
| 1 | Federal unrelated business taxable income before net operating loss deduction and after \$1,000 specific deduction | 1 | 639,746. |
| 2 | New York State Article 13 and Article 23 tax deducted on federal return | 2 | |
| 3 | Additions required for shareholders of federal S corporations (see instructions) | 3 | |
| 4 | Grossed-up taxes for shareholders of New York S corporations (see instructions) | 4 | |
| 5 | Other additions (see instructions) | 5 | |
| 6 | Add lines 1 through 5 | 6 | 639,746. |
| 7 | Other income (see instructions) | 7 | |
| 8 | Federal S corporation shareholder subtractions (see instructions) | 8 | |
| 9 | Other subtractions (see instructions) SEE STATEMENT 1 | 9 | 630,093. |
| 10 | Total subtractions (add lines 7, 8, and 9) | 10 | 630,093. |
| 11 | Taxable income before net operating loss deduction (subtract line 10 from line 6) | 11 | 9,653. |
| 12 | New York net operating loss deduction (attach federal and NYS computations; see instructions) | 12 | 9,653. |
| 13 | Taxable income (subtract line 12 from line 11) | 13 | 0. |
| 14 | Allocated taxable income (multiply line 13 by _____% from line 42; or enter amount from line 13 if allocation is not claimed) | 14 | |
| 15 | Tax based on income (multiply line 14 by 9% (.09)) | 15 | 0. |
| 16 | Minimum tax | 16 | 250.00 |
| 17 | Tax (line 15 or line 16, whichever is larger) | 17 | 250. |
| 18 | Total prepayments from line 46 | 18 | 4,386. |
| 19 | Balance (if line 18 is less than line 17, subtract line 18 from line 17) | 19 | |
| 20 | Interest on late payment (see instructions) | 20 | |
| 21 | Late filing and late payment penalties (see instructions) | 21 | |
| 22 | Balance due (add lines 19, 20, and 21 and enter here; enter the payment amount on line A above) | 22 | |
| 23 | Overpayment (if line 17 is less than line 18, subtract line 17 from line 18) | 23 | 4,136. |
| 24 | Amount of overpayment on line 23 to be credited to next year | 24 | 4,136. |
| 25 | Amount of overpayment on line 23 to be refunded (subtract line 24 from line 23) | 25 | |

See page 3 for third-party designee, certification, and signature entry areas.

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Have you been audited by the Internal Revenue Service in the past 5 years? Yes No If Yes, list years: _____

Federal return was filed on: 990-T Other: Attach a complete copy of your federal return.

Schedule A - Unrelated business allocation

If you did not maintain a regular place of business outside New York State, leave this schedule blank. A regular place of business is any office, factory, warehouse, or other space regularly used by the taxpayer in its unrelated business. If you claim this allocation, attach a list of each place of business, the location, nature of activities, and number and duties of employees.

| Average value of: | A New York State | B Everywhere | |
|--|---------------------|-----------------|---|
| 26 Real estate owned (see instructions) | 26 | | |
| 27 Gross rents (attach list; see instructions) | 27 | | |
| 28 Inventories owned | 28 | | |
| 29 Other tangible personal property owned (see instructions) | 29 | | |
| 30 Total (add lines 26 through 29) | 30 | | |
| 31 Percentage in New York State (divide line 30, column A, by line 30, column B) | 31 | | % |

Receipts in the regular course of business from:

| | | | |
|---|----|--|---|
| 32 Sales of tangible personal property shipped to points within New York State | 32 | | |
| 33 All sales of tangible personal property | 33 | | |
| 34 Services performed | 34 | | |
| 35 Rentals of property | 35 | | |
| 36 Other business receipts | 36 | | |
| 37 Total (add lines 32 through 36) | 37 | | |
| 38 Percentage in New York State (divide line 37, column A, by line 37, column B) | 38 | | % |
| 39 Wages, salaries, and other compensation of employees (except general executive officers; see instructions) | 39 | | |
| 40 Percentage in New York State (divide line 39, column A, by line 39, column B) | 40 | | % |
| 41 Total of New York State percentages (add lines 31, 38, and 40) | 41 | | % |
| 42 Business allocation percentage (divide line 41 by three or by the number of percentages) | 42 | | % |

Composition of prepayments claimed on line 18*

| | Date paid | Amount |
|---|-----------|--------|
| 43 Payment with extension request, Form CT-5, line 5 | 43 | |
| 44a Second installment from Form CT-400 | 44a | |
| 44b Third installment from Form CT-400 | 44b | |
| 44c Fourth installment from Form CT-400 | 44c | |
| 45 Amount of overpayment credited from prior years | 45 | 4,386. |
| 46 Total prepayments (add lines 43 through 45; enter here and on line 18) | 46 | 4,386. |

* Taxpayers subject to the unrelated business income tax are not required to make estimated tax payments. If you did make these unrequired payments, report them on lines 44a, 44b, and 44c.

Amended return information

If filing an amended return, mark an X in the box for any items that apply and attach documentation.

Final federal determination If marked, enter date of determination: • _____

Capital loss carryback Federal return filed Form 1139 •

Amended Form 990-T

400002221019



| | | | |
|---|--|-------------------------|-------------------------|
| Third - party designee (see instructions) | Yes <input type="checkbox"/> No <input type="checkbox"/> | Designee's name (print) | Designee's phone number |
| | Designee's email address | | PIN |

Certification: I certify that this return and any attachments are to the best of my knowledge and belief true, correct, and complete.

| | | | | |
|--------------------------|--|--------------------------------|---|-------------------------|
| Authorized person | Printed name of authorized person DOUGLAS STEWART | Signature of authorized person | Official title EXECUTIVE DIRECTOR | |
| | Email address of authorized person DSTEWART@MMFISHER.ORG | | Telephone number 248-415-1444 | Date 11-15-23 |

| | | | | |
|---|---|--|---|--|
| Paid preparer use only (see instr.) | Firm's name (or yours if self-employed) PLANTE & MORAN, PLLC | | Firm's EIN 38-1357951 | Preparer's PTIN or SSN P00645252 |
| | Signature of individual preparing this return DORI J. EGGETT | Address 2601 CAMBRIDGE CT., STE. 300 | | City State ZIP code AUBURN HILLS, MI 48326 |
| | Email address of individual preparing this return DORI.EGGETT@PLANTEMORAN.COM | | Preparer's NYTPRIN or Excl. code 03 | Date 11-08-23 |

See instructions for where to file.

400003221019



| FORM CT-13 | OTHER SUBTRACTIONS | STATEMENT 1 |
|-------------------------------------|--------------------|-------------|
| DESCRIPTION | | AMOUNT |
| INCOME ALLOCABLE TO OTHER STATES | | 630,093. |
| TOTAL TO FORM CT-13, PAGE 1, LINE 9 | | 630,093. |

| FORM CT-13 | NET OPERATING LOSS DEDUCTION | | | STATEMENT 2 |
|---|------------------------------|-------------------------|----------------|---------------------|
| TAX YEAR | LOSS SUSTAINED | LOSS PREVIOUSLY APPLIED | LOSS REMAINING | AVAILABLE THIS YEAR |
| 12/31/14 | 210,323. | 2,876. | 207,447. | 207,447. |
| 12/31/16 | 53,333. | 0. | 53,333. | 53,333. |
| 12/31/20 | 9,758. | 0. | 9,758. | 9,758. |
| 12/31/21 | 101,674. | 0. | 101,674. | 101,674. |
| TOTAL NOL CARRYOVER AVAILABLE THIS YEAR | | | 372,212. | 372,212. |
| AMOUNT OF NOL APPLIED THIS YEAR | | | 9,653. | |
| NOL CARRYOVER TO NEXT YEAR | | | 362,559. | |

| FORM 990-T | NET OPERATING LOSS DEDUCTION | | | STATEMENT 3 |
|-----------------------------------|------------------------------|-------------------------|----------------|---------------------|
| TAX YEAR | LOSS SUSTAINED | LOSS PREVIOUSLY APPLIED | LOSS REMAINING | AVAILABLE THIS YEAR |
| 12/31/18 | 136,726. | 136,726. | 0. | 0. |
| 12/31/19 | 321,532. | 166,162. | 155,370. | 155,370. |
| 12/31/20 | 705,589. | 0. | 705,589. | 705,589. |
| NOL CARRYOVER AVAILABLE THIS YEAR | | | 860,959. | 860,959. |

Electronic Filing PDF Attachment

MAX M. & MARJORIE S. FISHER FOUNDATION

Non-unitary partnership business income or loss allocable to California FEIN: 38-1784340

For the Tax Year 2022

| | FEIN Total | Withholding | |
|--|-------------------|--------------------|----------|
| BLACKSTONE RE PARTNERS V.TE.2, LP | 20-3799172 | 297 | - |
| SQUARE MILE PARTNERS III TE, LP | 26-2306799 | (2,001) | - |
| BREP VII.F (AV-LH), LP | 32-0359185 | (1,674) | - |
| BREP VII.F (AV-LH.4), LP | 30-0746590 | (3,920) | - |
| BREP VII.F-NQ (AV-LH.3), LP | 32-0384657 | 210 | - |
| SCULPTOR REAL ESTATE PARALLEL FUND III A, LP | 80-0961650 | (70) | - |
| BREP VIII.F (AV-LH), LP | 47-3861773 | (2,258) | - |
| BREP VIII.F (AV-LH.4), LP | 82-3091815 | (84) | - |
| BREP VIII.F-NQ (AV-LH.2), LP | 81-3401726 | (455) | - |
| Total NEW YORK UBTI | | (9,955) | - |

STATEMENT 1

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

Department of the Treasury
Internal Revenue Service

▶ **File a separate application for each return.**
▶ **Go to www.irs.gov/Form8868 for the latest information.**

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

| | | |
|--|--|---|
| Type or print | Name of exempt organization or other filer, see instructions. MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Taxpayer identification number (TIN) 38-1784340 |
| File by the due date for filing your return. See instructions. | Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | |
| | City, town or post office, state, and ZIP code. For a foreign address, see instructions. SOUTHFIELD, MI 48076 | |

Enter the Return Code for the return that this application is for (file a separate application for each return) 0 4

| Application Is For | Return Code | Application Is For | Return Code |
|--|-------------|-----------------------------------|-------------|
| Form 990 or Form 990-EZ | 01 | Form 1041-A | 08 |
| Form 4720 (individual) | 03 | Form 4720 (other than individual) | 09 |
| Form 990-PF | 04 | Form 5227 | 10 |
| Form 990-T (sec. 401(a) or 408(a) trust) | 05 | Form 6069 | 11 |
| Form 990-T (trust other than above) | 06 | Form 8870 | 12 |
| Form 990-T (corporation) | 07 | | |

EMILY DIEGEL

- The books are in the care of ▶ **TWO TOWNE SQUARE #900 - SOUTHFIELD, MI 48076**

Telephone No. ▶ **248-415-1440** Fax No. ▶ _____

- If the organization does not have an office or place of business in the United States, check this box
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) _____. If this is for the whole group, check this box . If it is for part of the group, check this box and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6-month extension of time until **NOVEMBER 15, 2023**, to file the exempt organization return for the organization named above. The extension is for the organization's return for:

- ▶ calendar year **2022** or
- ▶ tax year beginning _____, and ending _____.

2 If the tax year entered in line 1 is for less than 12 months, check reason: Initial return Final return Change in accounting period

| | | | |
|---|-----------|----|----------|
| 3a If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions. | 3a | \$ | 310,000. |
| b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. | 3b | \$ | 150,000. |
| c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions. | 3c | \$ | 160,000. |

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.

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

Department of the Treasury
Internal Revenue Service

▶ **File a separate application for each return.**
▶ **Go to www.irs.gov/Form8868 for the latest information.**

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

| | | |
|--|--|---|
| Type or print | Name of exempt organization or other filer, see instructions. MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Taxpayer identification number (TIN) 38-1784340 |
| File by the due date for filing your return. See instructions. | Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | |
| | City, town or post office, state, and ZIP code. For a foreign address, see instructions. SOUTHFIELD, MI 48076 | |

Enter the Return Code for the return that this application is for (file a separate application for each return) 0 7

| Application Is For | Return Code | Application Is For | Return Code |
|--|-------------|-----------------------------------|-------------|
| Form 990 or Form 990-EZ | 01 | Form 1041-A | 08 |
| Form 4720 (individual) | 03 | Form 4720 (other than individual) | 09 |
| Form 990-PF | 04 | Form 5227 | 10 |
| Form 990-T (sec. 401(a) or 408(a) trust) | 05 | Form 6069 | 11 |
| Form 990-T (trust other than above) | 06 | Form 8870 | 12 |
| Form 990-T (corporation) | 07 | | |

EMILY DIEGEL

- The books are in the care of ▶ **TWO TOWNE SQUARE #900 - SOUTHFIELD, MI 48076**

Telephone No. ▶ **248-415-1440** Fax No. ▶ _____

- If the organization does not have an office or place of business in the United States, check this box
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) _____. If this is for the whole group, check this box . If it is for part of the group, check this box and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6-month extension of time until **NOVEMBER 15, 2023**, to file the exempt organization return for the organization named above. The extension is for the organization's return for:

- ▶ calendar year **2022** or
- ▶ tax year beginning _____, and ending _____.

2 If the tax year entered in line 1 is for less than 12 months, check reason: Initial return Final return Change in accounting period

| | | |
|---|-----------|--------------------|
| 3a If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions. | 3a | \$ 0. |
| b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. | 3b | \$ 125,000. |
| c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions. | 3c | \$ 0. |

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.



Department of Taxation and Finance
Request for Six-Month Extension to File
 (for franchise/business taxes, MTA surcharge, or both)
 Tax Law - Articles 9-A, 13, and 33

CT-5

All filers must enter tax period:
 beginning ending

| | | | |
|---|---|--|--|
| Employer identification number (EIN) 38-1784340 | File number MM1 | Business telephone number 248-415-4000 | |
| Legal name of corporation MAX M. & MARJORIE S. FISHER FO INC. | | Trade name/DBA | |
| Mailing address Care of (c/o) | | State or country of incorporation | |
| Number and street or PO box TWO TOWNE SQUARE, 900 | | Date of incorporation | Foreign corporations: date began business in NYS |
| City SOUTHFIELD, MI | U.S. state/Canadian province MI | ZIP/Postal code 48076 | Country (if not United States) |
| For office use only | | | |

If you need to update your address or phone information for corporation tax, or other tax types, you can do so online. See *Business information* in Form CT-1.

Request for extension of time to file the following forms: Mark box(es) for one article only. Submit only one Form CT-5 and mark an in both boxes in the appropriate article if you are requesting an extension for **both** the franchise tax and MTA surcharge returns. For example, mark an in **both** the CT-3 box and the CT-3-M box under Article 9-A if you are requesting an extension of time to file **both** returns.

| Article 9-A | | Article 13 | | Article 33 | | | |
|-------------------------------|---------------------------------|---|--------------------------------|----------------------------------|----------------------------------|-----------------------------------|--|
| CT-3 <input type="checkbox"/> | CT-3-M <input type="checkbox"/> | CT-13 <input checked="" type="checkbox"/> | CT-33 <input type="checkbox"/> | CT-33-C <input type="checkbox"/> | CT-33-M <input type="checkbox"/> | CT-33-NL <input type="checkbox"/> | |

| | | |
|---|-----------|------------------|
| A. Pay amount shown on line 11. Make payable to: <i>New York State Corporation Tax</i> | | Payment enclosed |
| <input checked="" type="checkbox"/> Attach your payment here. Detach all check stubs. (See <i>instructions for details.</i>) | A. | |

Certain corporations filing as part of a combined group: Typically, taxpayers filing a combined return use Form CT-5.3. **However,** if for the tax year for which you are requesting an extension to file, you are either becoming a member of a **new** combined group, or being **added** to an **existing** group, you **must also** file Form CT-5. Complete the business information section above and line B. Then, mark an in the box on either line C or D (see *Corporations filing a combined franchise tax return only in the instructions*).

Do **not** complete line A and lines 1 through 16.

B. Enter the EIN of the combined group's designated agent (CT-3-A filers), or parent (CT-33-A filers)

Note: Failure to include the EIN of the designated agent (or parent) may delay processing of your extension request, and may result in penalties and interest.

C. If this extension request is for the **first** tax year that you are being included in a **new** combined group filing a combined return, mark an in the box

D. If this extension request is for the **first** tax year that you are being **added** to an **existing** combined group filing a combined return, mark an in the box

Computation of estimated franchise tax

| | | | |
|---|--|--------------------------------|-------------------------------------|
| 1 | Franchise tax from the <i>Worksheet for lines 1 and 6</i> in Form CT-5-l | <input type="text" value="1"/> | <input type="text" value="0."/> |
| 2 | | | |
| 3 | | | |
| 4 | Prepayments of franchise tax (from line 16, column A) | <input type="text" value="4"/> | <input type="text" value="4,386."/> |
| 5 | Balance due - franchise tax (subtract line 4 from line 1; do not enter less than zero) | <input type="text" value="5"/> | <input type="text" value="0."/> |

Computation of estimated MTA surcharge

| | | | |
|----|--|---------------------------------|--|
| 6 | MTA surcharge from the <i>Worksheet for lines 1 and 6</i> in Form CT-5-l | <input type="text" value="6"/> | |
| 7 | | | |
| 8 | | | |
| 9 | Prepayments of MTA surcharge (from line 16, column B) | <input type="text" value="9"/> | |
| 10 | Balance due - MTA surcharge (subtract line 9 from line 6; do not enter less than zero) | <input type="text" value="10"/> | |
| 11 | Total balance due (see instructions) | <input type="text" value="11"/> | |

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268511
01-03-23



Department of Taxation and Finance
Request for Six-Month Extension to File
 (for franchise/business taxes, MTA surcharge, or both)
 Tax Law - Articles 9-A, 13, and 33

CT-5

All filers must enter tax period:
 beginning **01-01-22** ending **12-31-22**

| | | | |
|--|---|--|--|
| Employer identification number (EIN) 38-1784340 | File number MM1 | Business telephone number 248-415-4000 | |
| Legal name of corporation MAX M. & MARJORIE S. FISHER FO INC. | | Trade name/DBA | |
| Mailing address Care of (c/o) | | State or country of incorporation | |
| Number and street or PO box TWO TOWNE SQUARE, 900 | | Date of incorporation | Foreign corporations: date began business in NYS |
| City SOUTHFIELD, MI | U.S. state/Canadian province MI | ZIP/Postal code 48076 | Country (if not United States) |
| For office use only | | | |
| If you need to update your address or phone information for corporation tax, or other tax types, you can do so online. See <i>Business information</i> in Form CT-1. | | | |

Request for extension of time to file the following forms: Mark box(es) for one article only. Submit only one Form CT-5 and mark an **X** in both boxes in the appropriate article if you are requesting an extension for **both** the franchise tax and MTA surcharge returns. For example, mark an **X** in **both** the CT-3 box and the CT-3-M box under Article 9-A if you are requesting an extension of time to file **both** returns.

| Article 9-A | | Article 13 | | Article 33 | | | |
|-------------------------------|---------------------------------|---|--------------------------------|----------------------------------|----------------------------------|-----------------------------------|--|
| CT-3 <input type="checkbox"/> | CT-3-M <input type="checkbox"/> | CT-13 <input checked="" type="checkbox"/> | CT-33 <input type="checkbox"/> | CT-33-C <input type="checkbox"/> | CT-33-M <input type="checkbox"/> | CT-33-NL <input type="checkbox"/> | |

| | | |
|---|-----------|------------------|
| A. Pay amount shown on line 11. Make payable to: <i>New York State Corporation Tax</i> | | Payment enclosed |
| A. Attach your payment here. Detach all check stubs. (See <i>instructions for details.</i>) | A. | |

Certain corporations filing as part of a combined group: Typically, taxpayers filing a combined return use Form CT-5.3. **However,** if for the tax year for which you are requesting an extension to file, you are either becoming a member of a **new** combined group, or being **added** to an **existing** group, you **must also** file Form CT-5. Complete the business information section above and line B. Then, mark an **X** in the box on either line C or D (see *Corporations filing a combined franchise tax return only in the instructions*).

Do **not** complete line A and lines 1 through 16.

B. Enter the EIN of the combined group's designated agent (CT-3-A filers), or parent (CT-33-A filers) **B**

Note: Failure to include the EIN of the designated agent (or parent) may delay processing of your extension request, and may result in penalties and interest.

C. If this extension request is for the **first** tax year that you are being included in a **new** combined group filing a combined return, mark an **X** in the box **C**

D. If this extension request is for the **first** tax year that you are being **added** to an **existing** combined group filing a combined return, mark an **X** in the box **D**

Computation of estimated franchise tax

| | | | |
|---|--|----------|---------------|
| 1 | Franchise tax from the <i>Worksheet for lines 1 and 6</i> in Form CT-5-l | 1 | 0. |
| 2 | | | |
| 3 | | | |
| 4 | Prepayments of franchise tax (from line 16, column A) | 4 | 4,386. |
| 5 | Balance due - franchise tax (subtract line 4 from line 1; do not enter less than zero) | 5 | 0. |

Computation of estimated MTA surcharge

| | | | |
|----|--|-----------|--|
| 6 | MTA surcharge from the <i>Worksheet for lines 1 and 6</i> in Form CT-5-l | 6 | |
| 7 | | | |
| 8 | | | |
| 9 | Prepayments of MTA surcharge (from line 16, column B) | 9 | |
| 10 | Balance due - MTA surcharge (subtract line 9 from line 6; do not enter less than zero) | 10 | |
| 11 | Total balance due (see <i>instructions</i>) | 11 | |

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268511
01-03-23

Composition of prepayments - Use this worksheet to determine the prepayments of franchise tax on line 4 and the prepayments of the MTA surcharge on line 9. See instructions.

| | Date paid | A. Franchise tax | B. MTA surcharge |
|--|------------|------------------|------------------|
| 12 Mandatory first installment from Form CT-300 ... | 12 | | |
| 13a Second installment from Form CT-400 | 13a | | |
| 13b Third installment from Form CT-400 | 13b | | |
| 13c Fourth installment from Form CT-400 | 13c | | |
| 14 Overpayment credited from prior years | 14 | 4,386. | |
| 15 Overpayment credited from Form CT- _____ Period _____ | 15 | | |
| 16 Total prepayments (total all entries in column A and column B) | 16 | 4,386. | |

| | | | |
|--|---|--|--|
| Paid preparer use only <i>(see instr.)</i> | Firm's name (or yours if self-employed) PLANTE & MORAN PLLC | Firm's EIN 38-1357951 | Preparer's PTIN or SSN P00645252 |
| | Signature of individual preparing this document DORI J. EGGETT | City 2601 CAMBRIDGE CT ST AUBURN HILLS | State ZIP code MI 48326 |
| | Email address of individual preparing this document DORI.EGGETT@PLANTEMORAN.COM | Excl. code 03 | Date 05-02-23 |

RETURN MUST BE E-FILED.
This form cannot be paper filed - this copy is for informational purposes only.

455002221019



TAX RETURN FILING INSTRUCTIONS

NORTH CAROLINA FORM CD-405

FOR THE YEAR ENDING
DECEMBER 31, 2022

PREPARED FOR:

MS. EMILY DIEGEL
MAX M. & MARJORIE S. FISHER FOUNDATION
TWO TOWNE SQUARE 900
SOUTHFIELD, MI 48076

PREPARED BY:

PLANTE & MORAN, PLLC
2601 CAMBRIDGE CT., STE. 300
AUBURN HILLS, MI 48326

TO BE SIGNED AND DATED BY:

THE AUTHORIZED INDIVIDUAL(S).

AMOUNT OF TAX:

| | | |
|------------------------------|----|-----|
| TOTAL TAX | \$ | 474 |
| LESS: PAYMENTS AND CREDITS | \$ | 0 |
| PLUS: OTHER AMOUNT | \$ | 0 |
| PLUS: INTEREST AND PENALTIES | \$ | 0 |
| BALANCE DUE | \$ | 474 |

OVERPAYMENT:

| | | |
|--------------------------------|----|---|
| CREDITED TO YOUR ESTIMATED TAX | \$ | 0 |
| OTHER AMOUNT | \$ | 0 |
| REFUNDED TO YOU | \$ | 0 |

MAKE CHECK PAYABLE TO:

N.C. DEPT. OF REVENUE

MAIL TAX RETURN AND CHECK (IF APPLICABLE) TO:

NCDOR
P.O. BOX 25000
RALEIGH, NC 27640-0500

RETURN MUST BE MAILED ON OR BEFORE:

NOVEMBER 15, 2023

SPECIAL INSTRUCTIONS:

INCLUDE CD-V, CORPORATE PAYMENT VOUCHER WITH YOUR RETURN.

REQUIRED ATTACHMENTS FROM THE FEDERAL RETURN, FORM 990-T, HAVE BEEN ATTACHED TO THE FILING COPY OF THIS RETURN.

Did you know you can pay online?

Benefits of Paying Taxes Online

- Accurate, secure, convenient
- Schedule payments in advance
- Bank drafts (free), MasterCard or Visa (\$2 convenience fee for every \$100 paid)
- Enjoy peace of mind, knowing your payment will be processed timely and efficiently

How to Pay Taxes Online

Visit www.ncdor.gov and search for online file and pay.

How to Pay Taxes Using Paper

If you are unable to pay online, complete the voucher (below), cut across the dotted line, and send the completed voucher and your check or money order to the NCDOR, PO Box 25000, Raleigh, NC 27640-0650. If you pay taxes online, DO NOT submit the paper voucher.

↓ Cut Here ↓

269831 09-22-22

CD-V (39)

Corporate Income Tax Payment Voucher

9-24-12

North Carolina Department of Revenue

| | | | | |
|------------------------------------|------|-----------------------------|--------------------------------|--------------|
| For calendar year | 2022 | or other tax year beginning | | and ending |
| MAX M MARJORIE S FISHER FOUNDATION | | | | ***** |
| TWO TOWNE SQUARE | | | Y NP/TE | N NF N CO/MA |
| SOUTHFIELD | MI | 48076 | Total Corporate Income Tax Due | \$ 474.00 |

6620139004



12220 3817843408 0000000 06505

CD-405 (39)
8-18-22

C Corporation Tax Return 2022
North Carolina Department of Revenue

DOR Use Only

For calendar year 2022, or other tax year beginning 22 and ending

| | |
|--|--|
| MAX M & MARJORIE S FISHER FOUNDATION, TWO TOWNE SQUARE SOUTHFIELD MI 48076 | Federal Employer ID Number ***** N.C. Secretary of State ID Number NAICS Code 211100 |
|--|--|

Initial Return Short Year Return Captive REIT Non U.S./Foreign NC-Rehab NC-478 is attached
 Final Return Amended Return Tax Exempt Combined Return (Approved Taxpayers Only) Has Escheatable Property

Federal Extension Were you granted an automatic extension to file your 2022 federal income tax return (Form 1120)? Yes No

MAX TWO 48076 ***** 211100

PP ***** PFSP F IR N FR Y SR N AR N

TN 2484154000 RE N TE Y NF N CR N NCR N 478 EP N FDEXT Y

MAX M & MARJORIE S FISHER FOUNDATION INC

| TWO TOWNE SQUARE | SOUTHFIELD | MI | 48076 | |
|------------------|------------|---------|-------|-----------|
| GR | 0 07 | 639746 | 19 | 0 31 0 |
| TA | 0 08 | -620806 | 21 | 0 EU |
| 01 | 0 10 | 0 | 23 | 474 32A 0 |
| HCE | N 12 | 0 | 24A | 0 32B 0 |
| 02 | 0 13 | 18940 | 24B | 0 35 0 |
| 03 | 0 14 | 1000000 | 24C | 0 36 0 |
| 04 | 0 15 | 18940 | 24D | 0 37 0 |
| 05 | 0 16 | 0 | 24E | 0 38 0 |
| 06 | 0 17 | 18940 | 26 | 474 |
| | 18 | 0 | 27 | 0 |



| | | | |
|---|---|---------------------------|---|
| 1. Net Worth | 0 | 4. Tax Credits | 0 |
| Holding Company Exception | N | 5. Franchise Tax Due | 0 |
| 2. Total Franchise Tax Due | 0 | 6. Franchise Tax Overpaid | 0 |
| 3. Payment with Franchise Tax Extension | 0 | | |

I declare and certify that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete.

Refund Due 0 Payment Due 474

Check here if you authorize the North Carolina Department of Revenue to discuss this return and attachments with the paid preparer below.

Signature and Title of Officer: EXECUTIVE DIREC Date: Corporate Phone Number: 248-415-4000

PAID PREPARER USE ONLY If prepared by a person other than taxpayer, this certification is based on all information of which the preparer has any knowledge.

Signature of Paid Preparer: DORI J. EGGETT Date: 11/08/2023 Preparer's Phone Number: (248) 375-7100 Preparer's FEIN, SSN, or PTIN: ** - *****

FEIN SSN PTIN

CD-405 Line-by-Line Information

N.C. Education Endowment Fund: You may contribute to the N.C. Education Endowment Fund by making a contribution or designating some or all of your overpayment to the Fund. To make a contribution, enclose Form NC-EDU and your payment of 0

| Sch. B Computation of Corporate Income Tax | | Sch. C Net Worth | |
|--|------------|---|----------|
| 7. Federal Taxable Income Before NOL | 639746 | 4. Accumulated depreciation, depletion, and amortization permitted for income tax purposes (Attach sch) | 0 |
| 8. Adjustments to Federal Taxable Income | -620806 | 5. Line 3 minus Line 4 | 0 |
| 9. Net Income Before Contributions | 18940 | 6. Affiliated indebtedness (Attach schedule) | 0 |
| 10. Contributions to Donees Outside N.C. | 0 | 7. Line 5 plus (or minus) Line 6 | 0 |
| 11. N.C. Taxable Income | 18940 | 8. Apportionment factor | 0.0000 % |
| 12. Nonapportionable Income | 0 | 9. Net Worth | 0 |
| 13. Apportionable Income | 18940 | Sch. G Federal Taxable Income Before NOL Deduction | |
| 14. Apportionment Factor | 100.0000 % | 1. a. Gross receipts or sales | 0 |
| 15. Income Apportioned to N.C. | 18940 | b. Returns and allowances | 0 |
| 16. Nonapportionable Income Allocated to N.C. | 0 | c. Balance - Line 1a minus Line 1b | 0 |
| 17. Income Subject to N.C. Tax | 18940 | 2. Cost of goods sold (Attach schedule) | 0 |
| 18. % Depletion over Cost - N.C. Property | 0 | 3. Gross Profit (Line 1c minus Line 2) | 0 |
| 19. State Net Loss (Attach schedule) | 0 | 4. Dividends (Attach schedule) | 0 |
| 20. Income Before Contributions to N.C. Donees | 18940 | 5. a. Interest on obligations of U.S. and its instrumentalities | 0 |
| 21. Contributions to N.C. Donees | 0 | b. Other interest | 0 |
| 22. Net Taxable Income | 18940 | 6. Gross rents | 0 |
| 23. N.C. Net Income Tax | 474 | 7. Gross royalties (Attach schedule) | 0 |
| 24. Payments and Credits | | 8. Capital gain net income (Attach schedule) | 0 |
| a. Income Tax Extension | 0 | 9. Net gain (loss) (Attach schedule) | 0 |
| b. 2022 Estimated Tax (previous payments if amended) | 0 | 10. Other income (Attach schedule) | 0 |
| c. Partnership (include Form D-403, NC K-1) | 0 | 11. Total Income | 0 |
| d. Nonresident Withholding (include 1099 or W-2) | 0 | 12. Compensation of officers (Attach sch., including addresses) | 0 |
| e. Tax Credits | 0 | 13. Salaries and wages (less employment credits) | 0 |
| 25. Add Lines 24a through 24e | 0 | 14. Repairs and maintenance | 0 |
| 26. Income Tax Due | 474 | 15. Bad debts | 0 |
| 27. Income Tax Overpaid | 0 | 16. Rents | 0 |
| Tax Due or Refund | | 17. Taxes and licenses | 0 |
| 28. Franchise Tax Due or Overpayment | 0 | 18. Interest | 0 |
| 29. Income Tax Due or Overpayment | 474 | 19. Charitable contributions | 0 |
| 30. Balance of Tax Due or Overpayment | 474 | 20. a. Depreciation | 0 |
| 31. Underpayment of Estimated Income Tax | 0 | b. Depreciation included in cost of goods sold | 0 |
| EU. Exception to Underpayment of Estimated Tax | | c. Balance - Line 20a minus 20b | 0 |
| 32. a. Interest | 0 | 21. Depletion | 0 |
| b. Penalties | 0 | 22. Advertising | 0 |
| c. Add Lines 32a and 32b | 0 | 23. Pension, profit-sharing, and similar plans | 0 |
| 33. Total Due | 474 | 24. Employee benefit programs | 0 |
| 34. Overpayment | 0 | 25. Reserved for future use | 0 |
| 35. 2023 Estimated Income Tax | 0 | 26. Other deductions (Attach schedule) | 0 |
| 36. N.C. Nongame and Endangered Wildlife Fund | 0 | 27. Total Deductions | 0 |
| 37. N.C. Education Endowment Fund | 0 | 28. Taxable Income Per Federal Return Before NOL and Special Deductions | 0 |
| 38. Amount to be Refunded | 0 | 29. Special Deductions | 0 |
| Sch. C Net Worth | | 30. Federal Taxable Income Before NOL | 0 |
| 1. Total assets | 0 | | |
| 2. Total liabilities | 0 | | |
| 3. Line 1 minus Line 2 | 0 | | |

Sch. H Adjustments to Federal Taxable Income

| | | |
|---|-----|------------------------|
| 1. Additions | | |
| a. Taxes based on net income | 1a. | 0 |
| b. Contributions | 1b. | 0 |
| c. Royalties to related members | 1c. | 0 |
| d. Net interest expense to related members | 1d. | 0 |
| e. Expenses attributable to income not taxed | 1e. | 0 |
| f. Bonus depreciation | 1f. | 0 |
| g. Section 179 expense deduction | 1g. | 0 |
| h. Other (Attach schedule) | 1h. | 0 |
| 2. Total Additions | 2. | 0 |
| 3. Deductions | | |
| a. U.S. obligation interest (net of expenses) (Attach schedule) | 3a. | 0 |
| b. Other deductible dividends | 3b. | 0 |
| c. Royalties received from related members | 3c. | 0 |
| d. Qualified interest expense to related members | 3d. | 0 |
| e. Bonus depreciation | 3e. | 0 |
| f. Section 179 expense deduction | 3f. | 0 |
| g. Other (Attach schedule) | 3g. | 620806 |
| | | SEE STATEMENT 1 |
| 4. Total Deductions | 4. | 620806 |
| 5. Adjustments to Federal Taxable Income | 5. | -620806 |

Sch. I Contributions

| | | |
|---|-----|-----|
| 1. Contributions to Donees Outside N.C. | | |
| a. Total contributions to donees outside N.C. | 1a. | 0 |
| b. Multiply Schedule B, Line 9 by 5%, if Line 9 is greater than zero. Otherwise enter zero. | 1b. | 947 |
| c. Amount Deductible | 1c. | 0 |
| 2. Contributions to N.C. Donees | | |
| a. Total contributions to N.C. donees other than those listed in Line 2d | 2a. | 0 |
| b. Multiply Sch. B, Line 20 by 5%, if Line 20 is greater than zero. Otherwise enter zero. | 2b. | 947 |
| c. Enter the lesser of Line 2a or 2b | 2c. | 0 |
| d. Total contributions to the State of N.C. and its political subdivisions | 2d. | 0 |
| e. Amount Deductible | 2e. | 0 |

Sch. F Other Information - All Taxpayers Must Complete this Schedule

| | |
|--|---|
| <p>1. a. State of incorporation</p> <p> b. Date incorporated</p> <p>2. Date of N.C. Certificate of Authority</p> <p>3. a. Reg or principal trade or bus. in N.C. PARTNERSHIP</p> <p> b. Reg or principal trade or bus. everywhere PARTNERSHIP</p> <p>4. Principal place bus. is directed or managed SOUTHFIELD</p> <p>5. What was the last year the IRS redetermined the corporation's federal taxable income?</p> <p>6. a. Were adjustments reported to N.C.? N</p> <p> b. If so, when?</p> <p>7. Does this corporation finance or discount its receivables through a related or an affiliated company? N</p> | <p>8. Is this corporation subject to franchise tax but not N.C. income tax because the corporation's income tax activities are protected under P.L. 86-272? (If yes, attach explanation) N</p> <p>9. Officers' names and addresses:</p> <p> President</p> <p> Vice-President</p> <p> Secretary</p> <p> Treasurer</p> |
|--|---|

Explanation of Changes for Amended Return:

Sch. L Balance Sheet per Books

| Assets | Beginning of Tax Year | | End of Tax Year | |
|---|-----------------------|-----|-----------------|-----|
| | (a) | (b) | (c) | (d) |
| 1. Cash | | 0 | | 0 |
| 2. a. Trade notes and accounts receivable | 0 | | 0 | |
| b. Less allowance for bad debts (| 0) | 0 | 0) | 0 |
| 3. Inventories | | 0 | | 0 |
| 4. a. U.S. government obligations | | 0 | | 0 |
| b. State and other obligations | | 0 | | 0 |
| 5. Tax-exempt securities | | 0 | | 0 |
| 6. Other current assets (Attach end of year sch) | | 0 | | 0 |
| 7. Loans to shareholders | | 0 | | 0 |
| 8. Mortgage and real estate loans | | 0 | | 0 |
| 9. Other investments (Attach end of year sch) | | 0 | | 0 |
| 10. a. Buildings and other depreciable assets | 0 | | 0 | |
| b. Less accumulated depreciation (| 0) | 0 | 0) | 0 |
| 11. a. Depletable assets | 0 | | 0 | |
| b. Less accumulated depletion (| 0) | 0 | 0) | 0 |
| 12. Land (net of any amortization) | | 0 | | 0 |
| 13. a. Intangible assets (amortizable only) | 0 | | 0 | |
| b. Less accumulated amortization (| 0) | 0 | 0) | 0 |
| 14. Other assets (Attach end of year sch.) | | 0 | | 0 |
| 15. Total Assets | | 0 | | 0 |
| Liabilities and Shareholders' Equity | | | | |
| 16. Accounts payable | | 0 | | 0 |
| 17. Mortgages, notes, and bonds payable in less than 1 year | | 0 | | 0 |
| 18. Other current liabilities (Attach end of year schedule) | | 0 | | 0 |
| 19. Loans from shareholders | | 0 | | 0 |
| 20. Mortgages, notes, and bonds payable in 1 year or more | | 0 | | 0 |
| 21. Other liabilities (Attach end of year schedule) | | 0 | | 0 |
| 22. Capital stock: a. Preferred Stock | 0 | | 0 | |
| b. Common Stock | 0 | 0 | 0 | 0 |
| 23. Additional paid-in capital | | 0 | | 0 |
| 24. Retained earnings - Appropriated (Attach end of year schedule) | | 0 | | 0 |
| 25. Retained earnings - Unappropriated | | 0 | | 0 |
| 26. Adjustments to shareholders' equity (Attach end of year schedule) | | 0 | | 0 |
| 27. Less cost of treasury stock | (| 0) | (| 0) |
| 28. Total Liabilities and Shareholders' Equity | | 0 | | 0 |

Sch. M-1 Reconciliation of Income (Loss) per Books with Income per Return

| | | | |
|--|------|---|------|
| 1. Net income (loss) per books | 0 | 7. Income recorded on books this year | |
| 2. Federal income tax | 0 | not included on this return: | |
| 3. Excess of capital losses over capital gains | 0 | Tax-exempt interest | \$ 0 |
| 4. Income subject to tax not recorded on books this year: | 0 | | |
| 5. Expenses recorded on books this year not deducted on this return: | | 8. Deductions on this return not charged against book income this year: | |
| a. Depreciation | \$ 0 | a. Depreciation | \$ 0 |
| b. Charitable Contributions | \$ 0 | b. Charitable Contributions | \$ 0 |
| c. Travel and entertainment | \$ 0 | | |
| 6. Add Lines 1 through 5 | 0 | 9. Add Lines 7 and 8 | 0 |
| | 0 | 10. Income | 0 |

This page must be filed with this form.

Legal Name (First 10 Characters)

MAX M & MA

Federal Employer ID Number

Sch. M-2 Retained Earnings Analysis

| | | | |
|---------------------------------|---|---------------------------|---|
| 1. Balance at beginning of year | 0 | 5. Distributions: a. Cash | 0 |
| 2. Net income (loss) per books | 0 | b. Stock | 0 |
| 3. Other increases: | | c. Property | 0 |
| | | 6. Other decreases: | 0 |
| | 0 | 7. Add Lines 5 and 6 | 0 |
| 4. Add Lines 1, 2, and 3 | 0 | 8. Balance at End of Year | 0 |

Sch. N Nonapportionable Income

| (A) Nonapportionable Income | (B) Gross Amounts | (C) Related Expenses | (D) Net Amounts | (E) Net Amounts Allocated Directly to N.C. |
|--|-------------------|----------------------|-----------------|--|
| | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 |
| | 0 | 0 | 0 | 0 |
| 1. Nonapportionable Income | | | 0 | |
| 2. Nonapportionable Income Allocated to N.C. | | | | 0 |

Explanation of why income listed is nonapportionable income rather than apportionable income:

Sch. O Computation of Apportionment Factor

Part 1. Domestic and Other Corporations Not Apportioning Franchise or Income Outside N.C. 100.0000 %

Part 2. Corporations Apportioning Franchise or Income to N.C. and to Other States

| | 1. Within North Carolina | 2. Total Everywhere |
|--|--------------------------|---------------------|
| 1. Gross Receipts Subject to Apportionment | 0 | 0 |
| 2. Gross Rents Subject to Apportionment | 0 | 0 |
| 3. Gross Royalties Subject to Apportionment | 0 | 0 |
| 4. Dividends Subject to Apportionment | 0 | 0 |
| 5. Interest Subject to Apportionment | 0 | 0 |
| 6. Other Apportionable Income | 0 | 0 |
| 7. Share of Receipts from Noncorporate Entities Subject to Apportionment | 0 | 0 |
| 8. Total | 0 | 0 |
| 9. N.C. Apportionment Factor | | 0.0000 % |

Part 3. Special Apportionment Formulas 0.0000 %

This page must be filed with this form.

CD-429B Underpayment of Estimated Tax by C-Corporations

For calendar year 2022, or other tax year beginning _____ 2022, and ending _____

| |
|--------------------|
| DOR Use Only |
|--------------------|

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

Federal Employer ID Number
38-1784340

Part 1. Computation of Underpayment

| | | | | | |
|---|-----|-----|-----|-----|-----|
| 1. 2022 net income tax (From 2022 Form CD-405, Schedule B, Line 23) | 1. | | | | |
| 2. 2022 tax credits (From 2022 Form CD-405, Schedule B, Line 24e) | 2. | | | | |
| 3. 2022 net tax due. Line 1 minus Line 2 | 3. | | | | |
| 4. Multiply Line 3 by 90%. If less than \$500, do not complete this form; the corporation does not owe interest on the underpayment of estimated tax | 4. | | | | |
| 5. 2021 net tax due (From 2021 Form CD-405, Schedule B, Line 26 minus Line 27e) If corporation is a "large corporation" as defined in IRC Section 6655, enter the amount from Line 4 on Line 5 | 5. | | | | |
| 6. Enter the smaller of Line 4 or Line 5 | 6. | | | | |
| 7. Installment due dates. Enter in columns (a) through (d) the 15th day of the 4th, 6th, 9th, and 12th months of the corporation's tax year. (If any date falls on a Saturday, Sunday, or legal holiday, substitute the next regular workday.) | 7. | (a) | (b) | (c) | (d) |
| 8. Required installments. Enter 25% of Line 6 above in each column. If corporation is using the annualized income installment method, enter the computed installment amounts on Line 8, Columns (a) - (d) and attach schedule showing computations | 8. | | | | |
| 9. Estimated tax paid or credited for each period | 9. | | | | |
| 10. Overpayment of previous installment. Enter amount from Line 13 of the preceding column. For Lines 10-13, complete one column before going to the next | 10. | | | | |
| 11. Add Lines 9 and 10 | 11. | | | | |
| 12. Underpayment. If Line 11 is less than or equal to Line 8, subtract Line 11 from Line 8; otherwise, go to Line 13 | 12. | | | | |
| 13. Overpayment. If Line 8 is less than Line 11, subtract Line 8 from Line 11 | 13. | | | | |

Part 2. Computation of Underpayment of Estimated Tax (See instructions for interest rate)

| | | | | | |
|--|-----|----|----|----|----|
| 14. Enter the installment dates from Line 7 | 14. | | | | |
| 15. Enter the amount of underpayment from Line 12 | 15. | | | | |
| 16. Enter the date of payment or the 15th day of the 4th month after the close of the tax year, whichever is earlier | 16. | | | | |
| 17. Number of days from due date of installment to the date shown on Line 16 | 17. | | | | |
| 18. $\frac{\text{Days on Line 17(a)} \times \text{interest rate} \times \text{amount on Line 15(a)}}{\text{Days in the tax year}}$ | 18. | \$ | | | |
| 19. $\frac{\text{Days on Line 17(b)} \times \text{interest rate} \times \text{amount on Line 15(b)}}{\text{Days in the tax year}}$ | 19. | | \$ | | |
| 20. $\frac{\text{Days on Line 17(c)} \times \text{interest rate} \times \text{amount on Line 15(c)}}{\text{Days in the tax year}}$ | 20. | | | \$ | |
| 21. $\frac{\text{Days on Line 17(d)} \times \text{interest rate} \times \text{amount on Line 15(d)}}{\text{Days in the tax year}}$ | 21. | | | | \$ |
| 22. Underpayment of Estimated Tax. Add Lines 18 - 21. Enter amount here and on Form CD-405, Schedule B, Line 31 | 22. | | | | \$ |

| | | |
|---|---|-------------|
| Form 2220 | Worksheet to Figure Required Installments Using The Annualized Income or Adjusted Seasonal Installment Methods Under Section 6655(e) | 2022 |
| MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | | 38-1784340 |

Part I Annualized Income Installment Method

| | (a) | (b) | (c) | (d) |
|--|-------------------|-------------------|-------------------|--------------------|
| | | First 3 Months | First 6 Months | First 9 Months |
| 1 Taxable income | | | | |
| 2 Annualization amounts | | 4 | 2 | 1.33333 |
| 3 Multiply line 1 by line 2 | | | | |
| | First 3 Months | First 5 Months | First 8 Months | First 11 Months |
| 4 Taxable income | | | | |
| 5 Annualization amounts | 4 | 2.4 | 1.5 | 1.09091 |
| 6 Multiply line 4 by line 5 | | | | |
| 7 Annualized taxable income. Enter the lesser of the amounts in each column on line 3 or 6 | | | | |
| 8 Tax on line 7 | | | | |
| 9 Other taxes for each period | | | | |
| 10 Total tax. Add lines 8 and 9 | | | | |
| 11 Credits as allowed | | | | |
| 12 Total tax after credits | | | | |
| 13 Applicable percentage | .25 | .50 | .75 | 1.00 |
| 14 Line 12 * line 13 | | | | |
| 15 Add the amounts in all preceding columns of line 16 | | | | |
| 16 Annualized income installment line 14 minus line 15 | | | | |

NC SCH H

OTHER DEDUCTIONS

STATEMENT 1

DESCRIPTION

AMOUNT

INCOME ALLOCABLE TO OTHER STATES

620,806.

TOTAL TO FORM CD-405, PAGE 3, SCHEDULE H, LINE 3G

620,806.

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

Department of the Treasury
Internal Revenue Service

▶ **File a separate application for each return.**
▶ **Go to www.irs.gov/Form8868 for the latest information.**

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

| | | |
|--|--|---|
| Type or print | Name of exempt organization or other filer, see instructions. MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Taxpayer identification number (TIN) 38-1784340 |
| File by the due date for filing your return. See instructions. | Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | |
| | City, town or post office, state, and ZIP code. For a foreign address, see instructions. SOUTHFIELD, MI 48076 | |

Enter the Return Code for the return that this application is for (file a separate application for each return) 0 4

| Application Is For | Return Code | Application Is For | Return Code |
|--|-------------|-----------------------------------|-------------|
| Form 990 or Form 990-EZ | 01 | Form 1041-A | 08 |
| Form 4720 (individual) | 03 | Form 4720 (other than individual) | 09 |
| Form 990-PF | 04 | Form 5227 | 10 |
| Form 990-T (sec. 401(a) or 408(a) trust) | 05 | Form 6069 | 11 |
| Form 990-T (trust other than above) | 06 | Form 8870 | 12 |
| Form 990-T (corporation) | 07 | | |

EMILY DIEGEL

- The books are in the care of ▶ **TWO TOWNE SQUARE #900 - SOUTHFIELD, MI 48076**

Telephone No. ▶ **248-415-1440** Fax No. ▶ _____

- If the organization does not have an office or place of business in the United States, check this box
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) _____. If this is for the whole group, check this box . If it is for part of the group, check this box and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6-month extension of time until **NOVEMBER 15, 2023**, to file the exempt organization return for the organization named above. The extension is for the organization's return for:

- ▶ calendar year **2022** or
- ▶ tax year beginning _____, and ending _____.

2 If the tax year entered in line 1 is for less than 12 months, check reason: Initial return Final return Change in accounting period

| | | | |
|---|-----------|----|----------|
| 3a If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions. | 3a | \$ | 310,000. |
| b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. | 3b | \$ | 150,000. |
| c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions. | 3c | \$ | 160,000. |

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.

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

Department of the Treasury
Internal Revenue Service

▶ **File a separate application for each return.**
▶ **Go to www.irs.gov/Form8868 for the latest information.**

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

| | | |
|--|--|---|
| Type or print | Name of exempt organization or other filer, see instructions. MAX M. & MARJORIE S. FISHER FOUNDATION, INC. | Taxpayer identification number (TIN) 38-1784340 |
| File by the due date for filing your return. See instructions. | Number, street, and room or suite no. If a P.O. box, see instructions. TWO TOWNE SQUARE, 900 | |
| | City, town or post office, state, and ZIP code. For a foreign address, see instructions. SOUTHFIELD, MI 48076 | |

Enter the Return Code for the return that this application is for (file a separate application for each return) 0 | 7

| Application Is For | Return Code | Application Is For | Return Code |
|--|-------------|-----------------------------------|-------------|
| Form 990 or Form 990-EZ | 01 | Form 1041-A | 08 |
| Form 4720 (individual) | 03 | Form 4720 (other than individual) | 09 |
| Form 990-PF | 04 | Form 5227 | 10 |
| Form 990-T (sec. 401(a) or 408(a) trust) | 05 | Form 6069 | 11 |
| Form 990-T (trust other than above) | 06 | Form 8870 | 12 |
| Form 990-T (corporation) | 07 | | |

EMILY DIEGEL

- The books are in the care of ▶ **TWO TOWNE SQUARE #900 - SOUTHFIELD, MI 48076**

Telephone No. ▶ **248-415-1440** Fax No. ▶ _____

- If the organization does not have an office or place of business in the United States, check this box
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) _____. If this is for the whole group, check this box . If it is for part of the group, check this box and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6-month extension of time until **NOVEMBER 15, 2023**, to file the exempt organization return for the organization named above. The extension is for the organization's return for:
▶ calendar year **2022** or
▶ tax year beginning _____, and ending _____.

2 If the tax year entered in line 1 is for less than 12 months, check reason: Initial return Final return
 Change in accounting period

| | | | |
|---|-----------|----|----------|
| 3a If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions. | 3a | \$ | 0. |
| b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. | 3b | \$ | 125,000. |
| c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions. | 3c | \$ | 0. |

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.

CD-419 (39)

8-21-19

**Application for
Corporate Income Tax Extension**

North Carolina Department of Revenue

GENERAL INSTRUCTIONS North Carolina law provides for an extension of time to file a North Carolina corporate tax return (Form CD-405, CD-401S, or CD-418). When timely filed, Form CD-419 extends the due date of the return by six months. An extension of time to file the return does not extend the time to pay the amount of tax due. If the taxpayer does not pay the full amount of tax due by the original due date of the return, interest and penalties will be assessed. (Note: For North Carolina income tax purposes, an income year that ends on any day other than the last day of the month is considered to end on the last day of the month nearest to the last day of the actual income year.)

To obtain an extension and pay any tax due, a taxpayer must file Form CD-419 by the original due date of the corporate tax return. A taxpayer can use the Department's website or mail the completed application to the address provided. The Department's website offers two electronic options, (1) an online filing and payment system, and (2) an eFile program. For more information, visit www.ncdor.gov.

IMPORTANT A corporation that is granted an automatic extension to file a federal income tax return is granted an automatic extension to file the corresponding State franchise and corporate income tax return. The corporation must certify on the State tax return that the corporation was granted a federal extension. If a corporation wants to make an extension payment, they may submit Form CD-419 with the payment.

| Worksheet for Computation of Tax Paid with Application for Extension | |
|---|------|
| 1. Total Franchise Tax Due (Minimum \$200.00) | 0.00 |
| 2. Franchise Tax Credits Taken (From Form CD-425) | 0.00 |
| 3. Net Franchise Tax Due Line 1 minus Line 2 | 0.00 |
| 4. Total Corporate Income Tax Due | 0.00 |
| 5. Estimated Income Tax Payments (Include any prior year's overpayment applied to current tax year) | 0.00 |
| 6. Corporate Income Tax Credits Taken (From Form CD-425) | 0.00 |
| 7. Net Corporate Income Tax Due Line 4 minus Line 5 and Line 6 | 0.00 |
| 8. Total Franchise and Corporate Income Tax Due with this Application Line 3 plus (or minus) Line 7 | |

↓ **Cut Here** ↓

269861 09-22-22

CD-419 (39)

8-13-13

Application for Corporate Income Tax Extension

North Carolina Department of Revenue

| | |
|--|---------------------------------|
| Mail to: NCDOR, PO Box 25000, Raleigh, NC 27640-0520 | Tax year starting and ending |
| <div style="display: flex; justify-content: space-between; align-items: center;"> <div style="font-size: 2em; font-weight: bold;">\$</div> <div style="text-align: right;"> Total Income Tax Due 0.00 </div> </div> | |

MI 48076

6420139010

