EXTENDED TO NOVEMBER 15, 2022 Form 990-T **Exempt Organization Business Income Tax Return** OMB No. 1545-0047 (and proxy tax under section 6033(e)) For calendar year 2021 or other tax year beginning ► Go to www.irs.gov/Form990T for instructions and the latest information. Department of the Treasury Open to Public Inspection for 501(c)(3) Organizations Only ▶ Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3). Internal Revenue Service Name of organization ( Check box if name changed and see instructions.) Check hox if address changed. **B** Exempt under section Print WILLIAMSBURG COMMUNITY HEALTH FOUNDATION 54-1822359 EGroup exemption numbe (see instructions) X 501(c)(3 Number, street, and room or suite no. If a P.O. box, see instructions. Type 4801 COURTHOUSE STREET, NO 200 408(e) 220(e) 408A ]530(a) City or town, state or province, country, and ZIP or foreign postal code ]529(a) [ WILLIAMSBURG, VA 23188 529A Check box if 158,429,478. C Book value of all assets at end of year ..... an amended return. Check organization type X 501(c) corporation 501(c) trust 401(a) trust Other trust Claim credit from Form 8941 Claim a refund shown on Form 2439 Check if filing only to Check if a 501(c)(3) organization filing a consolidated return with a 501(c)(2) titleholding corporation Enter the number of attached Schedules A (Form 990-T) During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group? Yes If "Yes," enter the name and identifying number of the parent corporation. The books are in care of ► KAREN BURDEN Telephone number ► 757-345-0912 **Total Unrelated Business Taxable Income** Total of unrelated business taxable income computed from all unrelated trades or businesses (see 316,433. instructions) 2 Reserved 2 316,433. 3 3 Add lines 1 and 2 Charitable contributions (see instructions for limitation rules) STMT 18 STMT 19 4 4 316,433. Total unrelated business taxable income before net operating losses. Subtract line 4 from line 3 5 5 STATEMENT 20 6 316,433. Deduction for net operating loss. See instructions 6 Total of unrelated business taxable income before specific deduction and section 199A deduction. 7 7 Subtract line 6 from line 5 1,000. Specific deduction (generally \$1,000, but see instructions for exceptions) 8 8 9 9 **Trusts.** Section 199A deduction. See instructions 1,000. Total deductions. Add lines 8 and 9 10 10 Unrelated business taxable income. Subtract line 10 from line 7. If line 10 is greater than line 7, 11 11 Tax Computation Organizations taxable as corporations. Multiply Part I, line 11 by 21% (0.21) 1 Trusts taxable at trust rates. See instructions for tax computation. Income tax on the amount on Tax rate schedule or Schedule D (Form 1041) 2 3 3 **Proxy tax.** See instructions 4 Other tax amounts. See instructions 4 Alternative minimum tax (trusts only) 5 5

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Tax on noncompliant facility income. See instructions

Total. Add lines 3 through 6 to line 1 or 2, whichever applies

For Paperwork Reduction Act Notice, see instructions.

6

Form **990-T** (2021)

Part		Tax and Payments			ı ag	<u> </u>
1a		gn tax credit (corporations attach Form 1118; trusts attach Form 1116)	1a			—
b		r credits (see instructions)				
c		ral business credit. Attach Form 3800 (see instructions)				
d		t for prior year minimum tax (attach Form 8801 or 8827)				
e		credits. Add lines 1a through 1d		1e		
2		ract line 1e from Part II, line 7				<u>.</u>
3		r amounts due. Check if from: Form 4255 Form 8611 Form		orm 8866		_
•	O 11.10.	Others (attack adaptation)				
4	Total	tax. Add lines 2 and 3 (see instructions).				_
-		on 1294. Enter tax amount here	_ ′	4	(	).
5		ent net 965 tax liability paid from Form 965-A or Form 965-B, Part II, column (k),				<u>.</u>
6a		nents: A 2020 overpayment credited to 2021	1 1			_
b		estimated tax payments. Check if section 643(g) election applies	6b			
С		leposited with Form 8868	6c			
d	Forei	gn organizations: Tax paid or withheld at source (see instructions)				
е		up withholding (see instructions)				
f		t for small employer health insurance premiums (attach Form 8941)				
g	Other	r credits, adjustments, and payments: Form 2439	_			
		Form 4136 Other Total	▶ 6g			
7	Total	payments. Add lines 6a through 6g		7		
8	Estim	ated tax penalty (see instructions). Check if Form 2220 is attached		▶ □ 8		
9						
10	Over	payment. If line 7 is larger than the total of lines 4, 5, and 8, enter amount over	paid	10		
11		the amount of line 10 you want: Credited to 2022 estimated tax		Refunded ► 11		
Part		Statements Regarding Certain Activities and Other Information				
1		y time during the 2021 calendar year, did the organization have an interest in o	· ·	•	Yes N	10
		a financial account (bank, securities, or other) in a foreign country? If "Yes," the	•	•		
		EN Form 114, Report of Foreign Bank and Financial Accounts. If "Yes," enter the	ne name of the for	reign country	,	
_	here				—— <del> </del>	<u>X</u>
2		g the tax year, did the organization receive a distribution from, or was it the gra			-	X
		ın trust?				
•		s," see instructions for other forms the organization may have to file. the amount of tax-exempt interest received or accrued during the tax year		<b>&gt;</b> \$		
3 4		available pre-2018 NOL carryovers here \$ 508,711. Do not				
7		n on Schedule A (Form 990-T). Don't reduce the NOL carryover shown here by	* *	•		
5		2017 NOL carryovers. Enter available Business Activity Code and post-2017 N	-	•		
3		mounts shown below by any NOL claimed on any Schedule A, Part II, line 17 fo				
	tiic ai	Business Activity Code		st-2017 NOL carryover		
		525990	\$	243,68	39.	
		3_33,73	\$			
6a	Did th	ne organization change its method of accounting? (see instructions)	<b>*</b>			X
b		is "Yes," has the organization described the change on Form 990, 990-EZ, 990	-PF. or Form 1128	3? If "No."		
		in in Part V	,	,		
Part	V	Supplemental Information				
Provide	the e	xplanation required by Part IV, line 6b. Also, provide any other additional inforn	nation. See instru	ctions.		
		nder penalties of perjury, I declare that I have examined this return, including accompanying schedules and prrect, and complete. Declaration of preparer (other than taxpayer) is based on all information of which prep			f, it is true,	
Sign		shoot, and complete. Declaration of proparer totals trial taxpayer, is based on an information of which pre-	Jaior rias arry Kriowiedgi		scuss this return with	一
Here		PRESII	DENT & CE	^	nown below (see	
		Signature of officer Date Title		instructions)?	X Yes N	No
		Print/Type preparer's name Preparer's signature	Date	Check if PTIN		
Paid				self- employed		
Prepa	arer	LAKRISHA J. WATSON LAKRISHA J. WATSON	11/13/22		1677333	
Use C		Firm's name ▶ FORVIS, LLP		Firm's EIN ► 44-	-0160260	
	•	901 EAST CARY STREET, SUITE 1	.000			_
		Firm's address ► RICHMOND, VA 23219			282-7636	
123711 0	1-31-22			F	orm 990-T (20	21)

FORM 990-T CONTRIBUTIONS		STATEMENT 18
DESCRIPTION/KIND OF PROPERTY	METHOD USED TO DETERMINE FMV	AMOUNT
CHARITABLE CONTRIBUTIONS - PRIVATE ADVISORS SMALL COMPANY BUYOUT FUND I	N/A	8.
CHARITABLE CONTRIBUTIONS - THE TIFF KEYSTONE FUND, LP	N/A	29.
TOTAL TO FORM 990-T, PART I, LI	NE 4	37.

FORM 990-T CONTI	RIBUTIONS SUMMARY		STATEMENT	19
QUALIFIED CONTRIBUTIONS SUBJECT QUALIFIED CONTRIBUTIONS SUBJECT				
CARRYOVER OF PRIOR YEARS UNUSED FOR TAX YEAR 2016 FOR TAX YEAR 2017 FOR TAX YEAR 2018 FOR TAX YEAR 2019 FOR TAX YEAR 2020	CONTRIBUTIONS 4,809,258			
TOTAL CARRYOVER TOTAL CURRENT YEAR 10% CONTRIBU	JTIONS	4,809,258 37		
TOTAL CONTRIBUTIONS AVAILABLE TAXABLE INCOME LIMITATION AS AI	OJUSTED	4,809,295 0	_	
EXCESS CONTRIBUTIONS EXCESS 100% CONTRIBUTIONS TOTAL EXCESS CONTRIBUTIONS		4,809,295 0 4,809,295	_	
ALLOWABLE CONTRIBUTIONS DEDUCT	ON		_	0
TOTAL CONTRIBUTION DEDUCTION				0

FORM 990-T	PRE 2018 NOL SCHEDULE	STATEMENT 20
PRE-2018 NOL CARRY FORWARD PRE-2018 NOL DEDUCTION INCI		508,711. 316,433.
SCHEDULE A PORTION OF PRE-2 SCHEDULE A ENTITY	2018 NOL SCHEDULE A SHARE	
1	0.	
TOTAL SCHEDULE A SHARE OF INTERPOLICE OF THE NET OPERATING DEDUCTION BALANCE AFTER PRE-2018 NOLEXPIRING NET OPERATING LOSS CARRY FORWARD OF NET OPERATIONS	0. 316,433. 0. 0. 192,278.	

FORM 990-T	PRE-201	8 NET OPERATING	LOSS DEDUCTION	STATEMENT 21
TAX YEAR	LOSS SUSTAINED	LOSS PREVIOUSLY APPLIED	LOSS REMAINING	AVAILABLE THIS YEAR
12/31/12	24,337.	24,337.	0.	0.
12/31/13	7,732.	7,732.	0.	0.
12/31/14	54,692.	13,262.	41,430.	41,430.
12/31/15	82,863.	0.	82,863.	82,863.
12/31/16	182,059.	0.	182,059.	182,059.
12/31/17	202,359.	0.	202,359.	202,359.
NOL CARRYOV	ER AVAILABLE THIS	YEAR	508,711.	508,711.

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

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

OMB No. 1545-0047

Department of the Treasury

► 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).

					50	ri(c)(3) Organizations Only
<b>A</b> N	Name of the organization WILLIAMSBURG COMMUNITY HEALTH FOUNDATION  B Employer 54-18				identification	
<u>c</u> .	Inrelated business activity code (see instructions) > 52599	0		<b>D</b> Sequence	e: 1	of 1
<u>E D</u>	escribe the unrelated trade or business   INVESTMENT I	N PA	RTNERSHIPS			
Par	t I Unrelated Trade or Business Income		(A) Income	(B) Expense	es	(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 Sch D (Form 1041 or Form 1120)). See instructions	4a	242,010.			242,010.
b	Net gain (loss) (Form 4797) (attach Form 4797). See instructions)	4b				
	Capital loss deduction for trusts	4c				
5	Income (loss) from a partnership or an S corporation (attach statement) STATEMENT 22	5	82,605.			82,605.
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) STMT 23		10,526.			10,526.
13	Total. Combine lines 3 through 12		335,141.			335,141.
	t II Deductions Not Taken Elsewhere See instructi		•	ictions Dedi	uctions n	•
Fai	directly connected with the unrelated business in		initiations on deal	actions. Deal		nust be
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	6,720.
7	Depreciation (attach Form 4562). See instructions		7			
8	Less depreciation claimed in Part III and elsewhere on return				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)		SEE STATI	EMENT 24	14	11,988.
15					15	18,708.
16	Unrelated business income before net operating loss deduction. S					
	column (C)				16	316,433.
17	Deduction for net operating loss. See instructions				17	0.
18	Unrelated business taxable income. Subtract line 17 from line 1				18	316,433.
LHA	For Paperwork Reduction Act Notice, see instructions.				Schedule A	A (Form 990-T) 2021

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Pac	ıe	2

Part	III Cost of Goods Sold Enter met	hod of inventory valuati	on 🕨		<u> </u>
1	Inventory at beginning of year			1	
2	Purchases			_	
3	Cost of labor			3	
4	Additional section 263A costs (attach statement)			4	
5	Other costs (attach statement)				
6	Total. Add lines 1 through 5				
7	Inventory at end of year				
8	Cost of goods sold. Subtract line 7 from line 6. Enter				
9	Do the rules of section 263A (with respect to property	produced or acquired for	or resale) apply to the o	organization?	Yes No
Part	IV Rent Income (From Real Property and	d Personal Proper	ty Leased with Re	eal Property)	
1	Description of property (property street address, city, s	state, ZIP code). Check	if a dual-use. See instru	uctions.	
	A				
	В				
	c				
	D				
		Α	В	С	D
2	Rent received or accrued				
а	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)				
С	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 Deductions directly connected with the income		and on Part I, line 6, co	olumn (A)	0.
4	in lines 2(a) and 2(b) (attach statement)				
_	Total deducations Add Con Analysis A Myseus D. E.	atau bana ana ban Bastil	Error (D)	_	0.
Part	Total deductions. Add line 4 columns A through D. Er  V Unrelated Debt-Financed Income (s	ee instructions)	iirie 6, column (B)		<u> </u>
1	Description of debt-financed property (street address,		hock if a dual uso. Soo	instructions	
•	A	city, state, Zii Codej. O	neck ii a dual-use. See	ilistractions.	
	В				
	c 🗆				
	D				
		A	В	С	
2	Gross income from or allocable to debt-financed	7			
_	property				
3	Deductions directly connected with or allocable				
•	to debt-financed property				
2	Straight line depreciation (attach statement)				
a b	Other deductions (attach statement)				
	Total deductions (add lines 3a and 3b,				
С	columns A through D)				
4					
4	Amount of average acquisition debt on or allocable to debt-financed property (attach statement)				
_					
5	Average adjusted basis of or allocable to debt-				
c	financed property (attach statement)		0/	0/	0/
6	Divide line 4 by line 5		%	%	<u>%</u>
7	Gross income reportable. Multiply line 2 by line 6		11 line 7 entrem (A)		0.
8	Total gross income (add line 7, columns A through D)	). Enter here and on Par	τι, line /, column (A)	<b>&gt;</b>	<u> </u>
_	Allegation designation and the Control of the Contr	П	Т	<u> </u>	
9	Allocable deductions. Multiply line 3c by line 6			(D)	
10	Total allocable deductions. Add line 9, columns A th				0.
	Total dividends-received deductions included in line	: IU		<b>&gt;</b>	U •

1 Page **3** 

Part	VI Interest, Annu	uities, R	oyalties, and Re	ents fror	n Control	led Or	ganization	S (see ins	tructions)		Page 3
		-					Exempt Contro				
	Name of controlled organization		. ,		al of specified nents made that is included controlling organized tion's gross in		column 4 ided in the organiza-	d in the connected wit			
(1)	1)										
(2)											
(3)											
<u>(4)</u>											
	<del> </del>			1	Controlled O		1		1		
7	7. Taxable Income	ir	Net unrelated ncome (loss) e instructions)		otal of specif syments mad		that is inc	of column 9 cluded in the organization s income	e n's	con	ductions directly inected with e in column 10
(1)											
(2)											
(3)											
(4)											
							Enter here	nns 5 and 10 and on Part column (A)		er he	lumns 6 and 11. ere and on Part I, 8, column (B)
Totals						•			0.		0.
Part	VII Investment	Income	of a Section 50	1(c)(7), (	9), or (17)	Orgai	nization (s	ee instruction	ons)		
	1. Desc	cription of	income		2. Amou incor		3. Deduction directly connumber (attach states	ected (atta	Set-asides ch stateme	ent)	5. Total deductions and set-asides (add cols 3 and 4)
<u>(1)</u>											_
(2)											
(3)										_	
(4)					Add amou	unto in					Add amounts in
Totals				•	column 2 here and o line 9, colu	. Enter n Part I,				ı	column 5. Enter here and on Part I, line 9, column (B)
Part		xempt /	Activity Income	, Other 1	Than Adve		g Income	(see instruct	ions)		
1	Description of exploite			-				•			
2	Gross unrelated busin	ess incom	e from trade or busi	ness. Ente	r here and o	n Part I,	line 10, colum	n (A)	2		
3	Expenses directly con	nected wit	h production of unr	elated busi	iness income	e. Enter	here and on Pa	art I,			
	line 10, column (B)								3		
4	Net income (loss) from										
	lines 5 through 7								4		
5	Gross income from ac	tivity that	is not unrelated bus	iness incor	me				5		
6	Expenses attributable								6		
7	Excess exempt expen			6, but do no	ot enter mor	e than th	ne amount on I	ine			
	4. Enter here and on F	Part II, line	12						7	l	

Schedule A (Form 990-T) 2021

	IX Advertising Income				
1	Name(s) of periodical(s). Check box if repor	ting two or more periodicals on a c	onsolidated basis		
	A				
	В				
	c 🗆				
	D				
Entor o	- —	as serresponding solumn			
iller a	amounts for each periodical listed above in th			С	
_	•	Α	В	<u> </u>	D
2	Gross advertising income				0.
	Add columns A through D. Enter here and o	on Part I, line 11, column (A)		<b>&gt;</b>	<u> </u>
а		[			
3	- · · · · · · · · · · · · · · · · · · ·				
а	Add columns A through D. Enter here and o	on Part I, line 11, column (B)		<b>&gt;</b>	0.
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	n in			
	line 4 showing a loss or zero, do not comple	ete			
	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 that				
	line 5, subtract line 6 from line 5. If line 5 is				
	than line 6, enter zero	I			
8	Excess readership costs allowed as a				
•	deduction. For each column showing a gair	n on			
	line 4, enter the lesser of line 4 or line 7				
а	Add line 8, columns A through D. Enter the		al or zero here and	1 on	
а	Part II, line 13	greater of the line oa, columns too			0.
Part :		Directors, and Trustees		<b>P</b>	
			ic instructions)	3. Percentage	4. Compensation
	<b>1.</b> Name	<b>2.</b> Title		of time devoted	attributable to
		<b>2.</b> 1100			
41	1. Name				uproloted business
	n ivanic			to business	unrelated business
	. Name			%	unrelated business
2)	I. Name			% %	unrelated business
2) 3)	I. Name			% % %	unrelated business
2)	I. IVaine			% %	unrelated business
2) 3) 4)				% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1			% % %	unrelated business
(1) (2) (3) (4) Total. Part	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	
2) 3) 4) Total.	. Enter here and on Part II, line 1	(see instructions)		% % %	

FORM 990-T (A) INCOME (LOSS) FROM PARTNERSHIPS	STATEMENT 22
DESCRIPTION	NET INCOME OR (LOSS)
PRIVATE ADVISORS SMALL COMPANY BUYOUT FUND I - ORDINARY	
BUSINESS INCOME (LOS PRIVATE ADVISORS SMALL COMPANY BUYOUT FUND I - NET RENTAL	4,451.
REAL ESTATE INCOME	638
PRIVATE ADVISORS SMALL COMPANY BUYOUT FUND I - OTHER NET	
RENTAL INCOME (LOSS	2
PRIVATE ADVISORS SMALL COMPANY BUYOUT FUND I - OTHER	4 106
INCOME (LOSS) THE TIFF KEYSTONE FUND, LP - ORDINARY BUSINESS INCOME	4,196
(LOSS)	202,086
THE TIFF KEYSTONE FUND, LP - NET RENTAL REAL ESTATE INCOME	-24,502
THE TIFF KEYSTONE FUND, LP - OTHER NET RENTAL INCOME	
(LOSS)	13
THE TIFF KEYSTONE FUND, LP - INTEREST INCOME	7,100
THE TIFF KEYSTONE FUND, LP - DIVIDEND INCOME THE TIFF KEYSTONE FUND, LP - ROYALTIES	190 4,118
THE TIFF KEYSTONE FUND, LP - OTHER PORTFOLIO INCOME (LOSS)	5,702
THE TIFF KEYSTONE FUND, LP - OTHER INCOME (LOSS)	-121,248
MREP 2008 DCIF LP - ORDINARY BUSINESS INCOME (LOSS)	-106
THE TIFF CENTERSTONE FUND, LP - ORDINARY BUSINESS INCOME	1.0
(LOSS) THE TIFF CENTERSTONE FUND, LP - INTEREST INCOME	-16. 1.
THE TIFF CENTERSTONE FUND, LP - INTEREST INCOME  THE TIFF CENTERSTONE FUND, LP - DIVIDEND INCOME	7
THE TIFF CENTERSTONE FUND, LP - OTHER PORTFOLIO INCOME	
(LOSS)	-23
THE TIFF CENTERSTONE FUND, LP - OTHER INCOME (LOSS)	- <b>4</b> .
TOTAL INCLUDED ON SCHEDULE A, PART I, LINE 5	82,605
FORM 990-T (A) OTHER INCOME	STATEMENT 23
DESCRIPTION	AMOUNT
CANCELLATION OF DEBT - THE TIFF KEYSTONE FUND, LP	10,526
TOTAL TO SCHEDULE A, PART I, LINE 12	10,526
TOTAL TO SCHEDOLE A, TAKE I, LINE IZ	

FORM 990-T (A)	OTHER DEDUCTI	ONS	STATEMENT 24
DESCRIPTION			AMOUNT
ACCOUNTING FEE INVESTMENT FEE OTHER DEDUCTIONS - PORTFOLIO	1,575. 1,362.		
COMPANY BUYOUT FUND OTHER DEDUCTIONS - PORTFOLIO	2. 9,049.		
TOTAL TO SCHEDULE A, PART I	11,988		
990-T SCH A POST-2	017 NET OPERATING	LOSS DEDUCTION	STATEMENT 25
TAX YEAR LOSS SUSTAINED	LOSS PREVIOUSLY APPLIED	LOSS REMAINING	AVAILABLE THIS YEAR
12/31/19 12/31/20 12/31/20 115,402.	128,287. 115,402.		
NOL CARRYOVER AVAILABLE THIS	S YEAR	243,689.	243,689.

#### 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-RIC, 1120-SF, or certain Forms 990-T. 
■ Go to www.irs.gov/Form1120 for instructions and the latest information.

OMB No. 1545-0123

Name

Employer identification number

WILLIAMSBURG COMMUI	NITY HEALTH FO	UNDATION		54-	1822359
Did the corporation dispose of any investmen	nt(s) in a qualified opportuni	ity fund during the tax ye	ear?		Yes X No
If "Yes," attach Form 8949 and see its instru					
Part I Short-Term Capital Gai	ns and Losses - Ass	ets 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)	<b>(e)</b> Cost (or other basis)	(g) Adjustments to ga or loss from Form(s) 89 Part I, line 2, column (	49,	(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					
<b>1b</b> Totals for all transactions reported on					
Form(s) 8949 with <b>Box A</b> checked					
2 Totals for all transactions reported on					
Form(s) 8949 with <b>Box B</b> checked					
3 Totals for all transactions reported on					
Form(s) 8949 with <b>Box C</b> checked					-5,142.
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	d exchanges from Form 8824			5	
6 Unused capital loss carryover (attach computa	ation)			6	( )
7 Net short-term capital gain or (loss). Combine				7	-5,142.
Part II Long-Term Capital Gai	ns and Losses - Asse	ets Held More Than	n 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 ga or loss from Form(s) 89 Part II, line 2, column	49,	(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 <b>Box D</b> checked					
9 Totals for all transactions reported on					
Form(s) 8949 with <b>Box E</b> checked					
10 Totals for all transactions reported on					
Form(s) 8949 with <b>Box F</b> checked			1		1,930.
				11	245,222.
12 Long-term capital gain from installment sales		,		12	
13 Long-term capital gain or (loss) from like-kind	d exchanges from Form 8824			13	
				14	047 150
15 Net long-term capital gain or (loss). Combine		ı h		15	247,152.
Part III Summary of Parts I and			Т		
16 Enter excess of net short-term capital gain (lir				16	242 010
17 Net capital gain. Enter excess of net long-term	i canital dain (line 15) over net	snort-term capital loss (line	e /)	17	242,010.
IX AND LINGS 16 AND 17 ENTER NOTE AND ON FORM					
Note: If losses exceed gains, see Capital Los	1120, page 1, line 8, or the app			18	242,010.

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

Schedule D (Form 1120) 2021

### Form **8949**

Department of the Treasury

Internal Revenue Service

Sales and Other Dispositions of Capital Assets

► Go to www.irs.gov/Form8949 for instructions and the latest information.
File with your Schedule D to list your transactions for lines 1b, 2, 3, 8b, 9, and 10 of Schedule D.

OMB No. 1545-0074

Attachment Sequence No. 12A

Name(s) shown on return

Social security number or taxpayer identification no.

54-1822359

#### WILLIAMSBURG COMMUNITY HEALTH FOUNDATION

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

Short-Term. Transactions involving capital assets you held 1 year or less are generally short-term (see instructions). For long-term Part I transactions, see page 2. Note: You may aggregate all short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the totals directly on Schedule D, line 1a; you aren't required to report these transactions on Form 8949 (see instructions). You must check Box A, B, or C below. Check only one box. If more than one box applies for your short-term transactions, complete a separate Form 8949, page 1, for each applicable box. If you have more short-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need (A) Short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above) (B) Short-term transactions reported on Form(s) 1099-B showing basis wasn't reported to the IRS X (C) Short-term transactions not reported to you on Form 1099-B Adjustment, if any, to gain or 1 (d) (h) (c) (e) loss. If you enter an amount Proceeds Description of property Date sold or Cost or other Gain or (loss). Date acquired in column (g), enter a code in (sales price) basis. See the Subtract column (e) (Example: 100 sh. XYZ Co.) (Mo., day, yr.) disposed of column (f). See instructions. Note below and from column (d) & (Mo., day, yr.) (g) Amount of adjustment see *Column (e*) ir combine the result Code(s) with column (g) the instructions THE TIFF KEYSTONE -3,469.FUND, LP THE TIFF CENTERSTONE FUND -1,673. 2 Totals. Add the amounts in columns (d), (e), (g), and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, line 1b (if Box A above is checked), line 2 (if Box B

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

23011 12-14-21 LHA For Paperwork Reduction Act Notice, see your tax return instructions.

Form 8949 (2021)

above is checked), or line 3 (if Box C above is checked)

Attachment Sequence No. 12A Page 2

Name(s) shown on return. Name and SSN or taxpayer identification no. not required if shown on page 1

Social security number or taxpayer identification no.

#### WILLIAMSBURG COMMUNITY HEALTH FOUNDATION

54-1822359

С

MIDDIANISDORG C							044333
Before you check Box D, E, or F belo statement will have the same informa broker and may even tell you which l	ow, see whether yation as Form 109	ou received any 99-B. Either will s	r Form(s) 1099-B o show whether you	r substitute statem r basis (usually you	ent(s) from r cost) was	your broker. A su reported to the IF	bstitute SS by your
Part II Long-Term. Transaction		ıl assets vou held r	more than 1 vear are	generally long-term (s	ee instructio	ons). For short-term t	ransactions.
see page 1.  Note: You may aggregate al							
codes are required. Enter the	e totals directly on S	Schedule D, line 8a	ı; you aren't required	to report these transa	actions on F	form 8949 (see instru	ctions).
You must check Box D, E, or F below. ( If you have more long-term transactions than will							each applicable box.
(D) Long-term transactions rep	oorted on Form(s	) 1099-B showin	g basis was report	ted to the IRS (see	Note abo	ove)	
(E) Long-term transactions rep	orted on Form(s	1099-B showing	g basis <b>wasn't</b> re	ported to the IRS		•	
X (F) Long-term transactions not	reported to you	on Form 1099-E	3	•			
1 (a)	(b)	(c)	(d)	(e)		nt, if any, to gain or	(h)
Description of property	Date acquired	Date sold or	Proceeds	Cost or other		ou enter an amount (g), enter a code in	Gain or (loss).
(Example: 100 sh. XYZ Co.)	(Mo., day, yr.)	disposed of	(sales price)	basis. See the  Note below and	column (f)	). See instructions.	Subtract column (e) from column (d) &
		(Mo., day, yr.)		see Column (e) in	(f)	(g)	combine the result
				the instructions	Code(s)	Amount of adjustment	with column (g)
THE TIFF KEYSTONE						aajaatiiiaiii	
FUND, LP							2,072.
THE TIFF							
CENTERSTONE FUND,							
LP							-142.
<u> </u>							144.
O Tabala Adalah		1 /1-1 / 1 1					
2 Totals. Add the amounts in colur							
negative amounts). Enter each to		•					
Schedule D, line 8b (if Box D abo	**	•					1 020
above is checked), or line 10 (if I			<u> </u>	<u> </u>			1,930.
Note: If you checked Box D above b	out the basis repo	orted to the IRS	was incorrect, ento	er in column (e) the	basis as r	eported to the IRS	S, and enter an

adjustment in column (g) to correct the basis. See Column (g) in the separate instructions for how to figure the amount of the adjustment.

### Form **4797**

Department of the Treasury Internal Revenue Service

Name(s) shown on return

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.

OMB No. 1545-0184

Attachment 2

Identifying number

WILLIAMSBURG COMMUNITY HEALTH FOUNDATION 54-1822359 1a Enter the gross proceeds from sales or exchanges reported to you for 2021 on Form(s) 1099-B or 1099-S (or substitute statement) that you are including on line 2, 10, or 20 1a b Enter the total amount of gain that you are including on lines 2, 10, and 24 due to the partial dispositions of 1b c Enter the total amount of loss that you are including on lines 2 and 10 due to the partial dispositions of MACRS 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) (f) Cost or other (e) Depreciation (g) Gain or (loss) (b) Date acquired (C) Date sold (a) Description (d) Gross sales basis, plus allowed or Subtract (f) from the of property (mo., day, yr.) (mo., day, yr.) price allowable since improvements and sum of (d) and (e) SEE STATEMENT 26 acquisition expense of sale Gain, if any, from Form 4684, line 39 3 Section 1231 gain from installment sales from Form 6252, line 26 or 37 4 Section 1231 gain or (loss) from like-kind exchanges from Form 8824 5 5 Gain, if any, from line 32, from other than casualty or theft 6 6 245,222. Combine lines 2 through 6. Enter the gain or (loss) here and on the appropriate line as follows 7 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 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 245,222. capital gain on the Schedule D filed with your return. See instructions Part II Ordinary Gains and Losses (see instructions) Ordinary gains and losses not included on lines 11 through 16 (include property held 1 year or less): Loss, if any, from line 7 11 Gain, if any, from line 7 or amount from line 8, if applicable 12 12 Gain, if any, from line 31 13 14 14 Net gain or (loss) from Form 4684, lines 31 and 38a Ordinary gain from installment sales from Form 6252, line 25 or 36 15 Ordinary gain or (loss) from like-kind exchanges from Form 8824 16 16 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. 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 18a 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 18b

LHA For Paperwork Reduction Act Notice, see separate instructions.

Pa	rt III Gain From Disposition of Propert	y Und	er Sections 1245	, 1250, 1252	, 125	64, and 1255	(see ir	nstructions)
19	(a) Description of section 1245, 1250, 1252, 1254, o	or 1255	property:			<b>(b)</b> Date acqui (mo., day, yr		(c) Date sold (mo., day, yr.)
_ <u>A</u>								
<u>B</u>								
<u></u> C								
_ <u>D</u>								
	These columns relate to the properties on lines 19A through 19D.	•	Property A	Property I	В	Property	С	Property D
20	Gross sales price ( <b>Note:</b> See line 1a before completing.)	20						
21	Cost or other basis plus expense of sale	21						
22	Depreciation (or depletion) allowed or allowable $\dots$	22						
23	Adjusted basis. Subtract line 22 from line 21	23						
<u>24</u>	Total gain. Subtract line 23 from line 20	24						
	If section 1245 property:							
	Depreciation allowed or allowable from line 22	25a						
	Enter the <b>smaller</b> of line 24 or 25a	25b						
26	If section 1250 property: If straight line depreciation was used, enter -0- on line 26g, except for a corporation subject to section 291.							
а	Additional depreciation after 1975. See instructions	26a						
b	Applicable percentage multiplied by the <b>smaller</b> of line 24 or line 26a. See instructions	26b						
c	Subtract line 26a from line 24. If residential rental property <b>or</b> line 24 isn't more than line 26a, skip lines 26d and 26e	26c						
d	Additional depreciation after 1969 and before 1976	26d						
	Enter the <b>smaller</b> of line 26c or 26d	26e						
f	Section 291 amount (corporations only)	26f						
	Add lines 26b, 26e, and 26f	26g						
	If section 1252 property: Skip this section if you didn't dispose of farmland or if this form is being completed for a partnership.							
	Soil, water, and land clearing expenses	27a						
	Line 27a multiplied by applicable percentage	27b						
	Enter the <b>smaller</b> of line 24 or 27b	27c						
	If section 1254 property: Intangible drilling and development costs, expenditures for development of mines and other natural deposits, mining exploration costs, and depletion. See instructions	28a						
	Enter the smaller of line 24 or 28a	28b						
29 a	If section 1255 property: Applicable percentage of payments excluded from income under section 126. See instructions	29a						
b	Enter the <b>smaller</b> of line 24 or 29a. See instructions	29b						
Su	mmary of Part III Gains. Complete property of	olumns	A through D through	line 29b before ç	going	to line 30.		
30	Total gains for all properties. Add property columns	A throu	gh D, line 24				30	
31	Add property columns A through D, lines 25b, 26g,	27c, 28	b, and 29b. Enter here	and on line 13			31	
32	Subtract line 31 from line 30. Enter the portion from		·					
	fuere allegations according on the eff are Ferrer 4707. Items		•	•			32	
Pa	irt IV Recapture Amounts Under Section	ns 179	9 and 280F(b)(2) \	When Busine	ess l	Jse Drops to	50% c	or Less
	(see instructions)							
						(a) Section 179	n	(b) Section 280F(b)(2)
33	Section 179 expense deduction or depreciation allo	wable ir	n prior years		33			
34				Г	34			
35	Recapture amount. Subtract line 34 from line 33. Se				35			

118012 12-17-21

FORM 4797	PRO	PERTY HELD	MORE THAN	N ONE YEAR	ST.	ATEMENT 26
DESCRIPTION	DATE ACQUIRED	DATE SOLD	SALES PRICE	DEPR.	COST OR BASIS	GAIN OR LOSS
PRIVATE ADVISORS SMALL COMPANY BUYOUT FU THE TIFF KEYSTONE						-4,482.
FUND, LP						249,704.
TOTAL TO 4797, PA	RT I, LINE	2				245,222.

#### 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-RIC, 1120-SF, or certain Forms 990-T. 
■ Go to www.irs.gov/Form1120 for instructions and the latest information.

OMB No. 1545-0123

Name

Employer identification number

WILLIAMSBURG COMMUI	NITY HEALTH FO	UNDATION		54-	1822359
Did the corporation dispose of any investmen	nt(s) in a qualified opportun	ity fund during the tax y	ear?		Yes X No
If "Yes," attach Form 8949 and see its instru					
Part I Short-Term Capital Gai	ns and Losses - Ass	ets 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	(d) Proceeds	(e) Cost	(g) Adjustments to ga or loss from Form(s) 89	49,	(h) Gain or (loss) Subtract column (e) from column (d) and combine the
round off cents to whole dollars.	(sales price)	(or other basis)	Part I, line 2, column	(g)	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					
<b>1b</b> Totals for all transactions reported on					
Form(s) 8949 with <b>Box A</b> checked					
2 Totals for all transactions reported on					
Form(s) 8949 with <b>Box B</b> checked					
3 Totals for all transactions reported on					
Form(s) 8949 with <b>Box C</b> checked					-5,142.
4 Short-term capital gain from installment sales	from Form 6252, line 26 or 37	7	•	4	
5 Short-term capital gain or (loss) from like-kind				5	
6 Unused capital loss carryover (attach computa				6	( )
7 Net short-term capital gain or (loss). Combine	e lines 1a through 6 in column	h		7	-5,142.
Part II   Long-Term Capital Gai	ns and Losses - Ass	ets Held More Tha	n 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.	<b>(d)</b> Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to ga or loss from Form(s) 89 Part II, line 2, column	49,	(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 <b>Box D</b> checked					
<b>9</b> Totals for all transactions reported on					
Form(s) 8949 with <b>Box E</b> checked					
10 Totals for all transactions reported on					1
Form(s) 8949 with <b>Box F</b> checked					1,930.
				11	245,222.
12 Long-term capital gain from installment sales		7		12	
13 Long-term capital gain or (loss) from like-kind	d exchanges from Form 8824			13	
				14	2.1- 1-2
15 Net long-term capital gain or (loss). Combine		n h		15	247,152.
Part III   Summary of Parts I and					Τ
16 Enter excess of net short-term capital gain (lin				16	0.40 0.40
17 Net capital gain. Enter excess of net long-term				17	242,010.
<b>18</b> Add lines 16 and 17. Enter here and on Form		olicable line on other return	s	18	242,010.
Note: If losses exceed gains, see Capital Los	ses in the instructions.				

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

Schedule D (Form 1120) 2021

Department of the Treasury Internal Revenue Service

### Sales and Other Dispositions of Capital Assets

Go to www.irs.gov/Form8949 for instructions and the latest information. ▶ File with your Schedule D to list your transactions for lines 1b, 2, 3, 8b, 9, and 10 of Schedule D.

Name(s) shown on return

Social security number or taxpayer identification no.

54-1822359

WILLIAMSBURG COMMUNITY HEALTH FOUNDATION	54-182235
Before you check Box A, B, or C below, see whether you received any Form(s) 1099-B or substitute statement(s) from your	
statement will have the same information as Form 1099-B. Fither will show whether your basis (usually your cost) was renou	rted to the IRS by your

broker and may even tell you which box to check. Short-Term. Transactions involving capital assets you held 1 year or less are generally short-term (see instructions). For long-term Part I transactions, see page 2. Note: You may aggregate all short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the totals directly on Schedule D, line 1a; you aren't required to report these transactions on Form 8949 (see instructions). You must check Box A, B, or C below. Check only one box. If more than one box applies for your short-term transactions, complete a separate Form 8949, page 1, for each applicable box. If you have more short-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need (A) Short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above) (B) Short-term transactions reported on Form(s) 1099-B showing basis wasn't reported to the IRS

1 (a) Description of property (Example: 100 sh. XYZ Co.)	(b) Date acquired (Mo., day, yr.)	(c) Date sold or disposed of	(d) Proceeds (sales price)	(e) Cost or other basis. See the	loss. If y in column	nt, if any, to gain or ou enter an amount (g), enter a code in ). See instructions.	(h) Gain or (loss). Subtract column (e)
		(Mo., day, yr.)		Note below and see Column (e) in the instructions	(f) Code(s)	(g) Amount of adjustment	from column (d) & combine the result with column (g)
THE TIFF KEYSTONE							
FUND, LP							<3,469.
THE TIFF							
CENTERSTONE FUND,							
LP							<1,673.
	-						
	-						
	-						
	-						
	-						
	-						
	-						
	+						
	+						
	1			1			
	1			1			
	1			1			
	1						
2 Totals. Add the amounts in colu							
negative amounts). Enter each to							
Schedule D, line 1b (if Box A ab							F 446
above is checked), or line 3 (if E	Box C above is ch	ecked)		1		I	<5,142.

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

123011 12-14-21 LHA For Paperwork Reduction Act Notice, see your tax return instructions.

Form 8949 (2021)

Attachment Sequence No. 12A Page 2

Name(s) shown on return. Name and SSN or taxpayer identification no. not required if shown on page 1

Social security number or taxpayer identification no.

#### WILLIAMSBURG COMMUNITY HEALTH FOUNDATION

Form 8949 (2021)

54-1822359

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 Cabadala D. line Service aren't required to report these transactions on Form 8949 (see instructions). 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 Adjustment, if any, to gain or 1 (a) (b) (c) (d) (e) (h) loss. If you enter an amount Proceeds Cost or other Gain or (loss). Description of property Date acquired Date sold or in column (g), enter a code in (sales price) basis. See the Subtract column (e) (Mo., day, yr.) (Example: 100 sh. XYZ Co.) disposed of column (f). See instructions. from column (d) & Note below and (Mo., day, yr.) combine the result see *Column (e*) ir Amount of Code(s) with column (g) the instructions adjustment THE TIFF KEYSTONE 2,072. FUND, LP THE TIFF CENTERSTONE FUND <142  $_{
m LP}$ 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)

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

Form 8949 (2021)

### Form **4797**

Department of the Treasury Internal Revenue Service Sales of Business Property

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

Attach to your tax return.

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

OMB No. 1545-0184

Attachment 27

Name(s) shown on return Identifying number WILLIAMSBURG COMMUNITY HEALTH FOUNDATION 54-1822359 1a Enter the gross proceeds from sales or exchanges reported to you for 2021 on Form(s) 1099-B or 1099-S (or substitute statement) that you are including on line 2, 10, or 20 1a b Enter the total amount of gain that you are including on lines 2, 10, and 24 due to the partial dispositions of 1b c Enter the total amount of loss that you are including on lines 2 and 10 due to the partial dispositions of MACRS 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) (f) Cost or other (e) Depreciation (g) Gain or (loss) (b) Date acquired (C) Date sold (a) Description (d) Gross sales basis, plus allowed or Subtract (f) from the of property (mo., day, yr.) (mo., day, yr.) price allowable since improvements and sum of (d) and (e) SEE STATEMENT 27 acquisition expense of sale Gain, if any, from Form 4684, line 39 3 Section 1231 gain from installment sales from Form 6252, line 26 or 37 4 Section 1231 gain or (loss) from like-kind exchanges from Form 8824 5 5 Gain, if any, from line 32, from other than casualty or theft 6 6 245,222. Combine lines 2 through 6. Enter the gain or (loss) here and on the appropriate line as follows 7 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 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 245,222. capital gain on the Schedule D filed with your return. See instructions Part II Ordinary Gains and Losses (see instructions) Ordinary gains and losses not included on lines 11 through 16 (include property held 1 year or less): Loss, if any, from line 7 11 Gain, if any, from line 7 or amount from line 8, if applicable 12 12 Gain, if any, from line 31 13 14 14 Net gain or (loss) from Form 4684, lines 31 and 38a Ordinary gain from installment sales from Form 6252, line 25 or 36 15 Ordinary gain or (loss) from like-kind exchanges from Form 8824 16 16 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. 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 18a 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 18b

LHA For Paperwork Reduction Act Notice, see separate instructions.

Pa	rt III Gain From Disposition of Propert	y Und	er Sections 1245	, 1250, 1252	, 125	64, and 1255	(see ir	nstructions)
19	(a) Description of section 1245, 1250, 1252, 1254, o	or 1255	property:			<b>(b)</b> Date acqui (mo., day, yr		(c) Date sold (mo., day, yr.)
_ <u>A</u>								
<u>B</u>								
<u></u> C								
_ <u>D</u>								
	These columns relate to the properties on lines 19A through 19D.	•	Property A	Property I	В	Property	С	Property D
20	Gross sales price ( <b>Note:</b> See line 1a before completing.)	20						
21	Cost or other basis plus expense of sale	21						
22	Depreciation (or depletion) allowed or allowable $\dots$	22						
23	Adjusted basis. Subtract line 22 from line 21	23						
<u>24</u>	Total gain. Subtract line 23 from line 20	24						
	If section 1245 property:							
	Depreciation allowed or allowable from line 22	25a						
	Enter the <b>smaller</b> of line 24 or 25a	25b						
26	If section 1250 property: If straight line depreciation was used, enter -0- on line 26g, except for a corporation subject to section 291.							
а	Additional depreciation after 1975. See instructions	26a						
b	Applicable percentage multiplied by the <b>smaller</b> of line 24 or line 26a. See instructions	26b						
c	Subtract line 26a from line 24. If residential rental property <b>or</b> line 24 isn't more than line 26a, skip lines 26d and 26e	26c						
d	Additional depreciation after 1969 and before 1976	26d						
	Enter the <b>smaller</b> of line 26c or 26d	26e						
f	Section 291 amount (corporations only)	26f						
	Add lines 26b, 26e, and 26f	26g						
	If section 1252 property: Skip this section if you didn't dispose of farmland or if this form is being completed for a partnership.							
	Soil, water, and land clearing expenses	27a						
	Line 27a multiplied by applicable percentage	27b						
	Enter the <b>smaller</b> of line 24 or 27b	27c						
	If section 1254 property: Intangible drilling and development costs, expenditures for development of mines and other natural deposits, mining exploration costs, and depletion. See instructions	28a						
	Enter the smaller of line 24 or 28a	28b						
29 a	If section 1255 property: Applicable percentage of payments excluded from income under section 126. See instructions	29a						
b	Enter the <b>smaller</b> of line 24 or 29a. See instructions	29b						
Su	mmary of Part III Gains. Complete property of	olumns	A through D through	line 29b before ç	going	to line 30.		
30	Total gains for all properties. Add property columns	A throu	gh D, line 24				30	
31	Add property columns A through D, lines 25b, 26g,	27c, 28	b, and 29b. Enter here	and on line 13			31	
32	Subtract line 31 from line 30. Enter the portion from		·					
	fuere allegations according on the eff are Ferrer 4707. Items		•	•			32	
Pa	irt IV Recapture Amounts Under Section	ns 179	9 and 280F(b)(2) \	When Busine	ess l	Jse Drops to	50% c	or Less
	(see instructions)							
						(a) Section 179	n	(b) Section 280F(b)(2)
33	Section 179 expense deduction or depreciation allo	wable ir	n prior years		33			
34				Г	34			
35	Recapture amount. Subtract line 34 from line 33. Se				35			

118012 12-17-21

FORM 4797	PROI	PERTY HELD	MORE THAN	ONE YEAR	STA	ATEMENT 27
DESCRIPTION	DATE ACQUIRED	DATE SOLD	SALES PRICE	DEPR.	COST OR BASIS	GAIN OR LOSS
PRIVATE ADVISORS SMALL COMPANY						
BUYOUT FU THE TIFF KEYSTONE						-4,482.
FUND, LP						249,704.
TOTAL TO 4797, PA	RT I, LINE	2				245,222.

## Return by a U.S. Transferor of Property

to a Foreign Corporation

• Go to www.irs.gov/Form926 for instructions and the latest information.

Attachment Sequence No.	128

OMB No. 1545-0026

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

Pa	(t) O.S. Transferor information (see instructions)			
	e of transferor		Identifying numbe	er (see instructions)
W.	ILLIAMSBURG COMMUNITY HEALTH FOUNDATION			
_				▼
1	Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation that is not a controlled foreign corporation.	ation?	Yes	X No
2	If the transferor was a corporation, complete questions 2a through 2d.	,		
а	If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368)			N.
	five or fewer domestic corporations?			∐ 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	
С	If the transferor was a member of an affiliated group filing a consolidated return, was it the parent of the not, list the name and employer identification number (EIN) of the parent corporation.	corporation?	Yes	No
	Name of parent corporation	EII	N of parent corporati	on
	Have basis adjustments under section 367(a)(4) been made?		Yes	No
u	Have basis adjustments under section 367(a)(4) been made?			
3	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	such under s	ection 367)	
	complete questions 3a through 3d.	saon anaon o	331,	
а	List the name and EIN of the transferor's partnership.			
	Name of partnership		EIN of partnership	
TI	HE TIFF CENTERSTONE FUND, LP	82-092	20606	
b	Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No
С	Is the partner disposing of its entire interest in the partnership?		Yes	X No
d	Is the partner disposing of an interest in a limited partnership that is regularly traded on an establis	shed		
	securities market?		Yes	X No
Pa	rt II Transferee Foreign Corporation Information (see instructions)			
4	Name of transferee (foreign corporation)		5a Identifying numb	<b>er</b> , if any
<u>H1</u>	ELIKON LONG SHORT EQUITY FUND ICAV			
6	Address (including country)		<b>5b</b> Reference ID num	ber
33 B00	SIR JOHN		PODETONIIC	
	GERSON'S QUAY, DUBLIN IRELAND		FOREIGNUS	
7 E:	Country code of country of incorporation or organization			
<u></u>	Foreign law characterization (see instructions)			
	DRPORATION			
9	Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No

Part III Information	n Regarding Trans	fer of Property (see	instruction	ons)		
Section A - Cash  Type of	(a)	(b)		(c)	(d)	(e)
property	Date of transfer	<b>(b)</b> Description of property		(c) arket value on e of transfer	Cost or other basis	Gain recògnized on transfer
Cash	02/02/2021			196,866.		
	nainder of Part III and go					X Yes No
Section B - Other Pr			subject			(a)
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) arket value on e of transfer	<b>(d)</b> Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and		proposes,				
securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
(including a branch the lif "Yes," continue to continue to transferee foreign configures," continue to domain Enter the transferred the transferred to the transferred to the transferor transfer "No," skip Section	domestic corporation the hat is a foreign disregard line 12c. If "No," skip line transfer, was the dome proporation?  line 12d. If "No," skip line 12d	nat transferred substantiall ded entity) to a specified 1 es 12c and 12d, and go to stic corporation a U.S. shee 12d, and go to line 13. In gross income as required in section 367(d)(4)?	y all of the a 0%-owned o line 13. areholder w	led entity) transferr assets of a foreign foreign corporation with respect to the	ed to a  branch ?	YesNoYesNoYesNoYesNo
Section C - Intangible	le Property Subjec	t to Section 367(d)			1	
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
 Totals						
						Form <b>926</b> (Rev. 11-2018)

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
С	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
Sup	pplemental Part III Information Required To Be Reported (see instructions)		
Da	rt IV Additional Information Regarding Transfer of Property (see instructions)		
Га	Additional information negatiting 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 • 008 %		
17	Type of nonrecognition transaction (see instructions) ► IRC SEC. 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.	_	
а	Gain recognition under section 904(f)(3)	Yes	X No
b			X No
С			X No
d	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X No
	If "Yes," complete lines 20b and 20c.		
b		▶\$	
С		• • •	
	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		
	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	X No

# 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.

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION		Identifying numbe	r (see instructions)
<ul> <li>1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation.</li> <li>2 If the transferor was a corporation, complete questions 2a through 2d.</li> <li>a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 36).</li> </ul>		Yes	X No
five or fewer domestic corporations?		Yes	No
		Yes	□ No
		1es	
If not, list the controlling shareholder(s) and their identifying number(s).			
Controlling shareholder	Ider	ntifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parer If not, list the name and employer identification number (EIN) of the parent corporation.	nt corporation?	Yes	No
Name of parent corporation	EIN of	parent corporation	on
d Have basis adjustments under section 367(a)(4) been made?		Yes	No No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated a complete questions 3a through 3d.	is such under sectio	n 367),	
a List the name and EIN of the transferor's partnership.			
Name of partnership	EIN	of partnership	
THE TIFF CENTERSTONE FUND, LP	82-09206	06	
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	•	Yes	X No
c Is the partner disposing of its entire interest in the partnership?			X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estat			110
securities market?	Jiisiieu	Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)		1es	21 110
4 Name of transferee (foreign corporation)	5a l	dentifying numbe	er, if any
RADCLIFFE INTERNATIONAL SPAC FUND, LTD			
6 Address (including country) 106 GORING AVE, BOX 492 GERORGE TOWN	<b>5b</b> F	Reference ID numb	per
GRAND CAYMAN KY1-1106 CAYMAN ISLANDS	FO	REIGNUS	
7 Country code of country of incorporation or organization CJ			
8 Foreign law characterization (see instructions) CAYMAN ISLANDS EXEMPTED COMPANY			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.		Form <b>926</b> (F	Rev. 11-2018)

Type of property   Date of prope		Regarding Tran	sfer of Property (see	instructi	ons)		<u> </u>
Date of property   Date of prope	Section A - Cash						
10   Was cash the only property transferred?	• •	Date of	Description of		arket value on	Cost or other	Gain recognized on
Section B - Other Property (other than intangible property subject to section 367(d))  Type of Date of Description of property transfer Description of property transfer property transfer property date of transfer basis transfer securities	Cash	04/02/2021			379,670.		
Type of property Date of Description of Parameter value on date of transfer Cost or other basis  Stock and securities	If "Yes," skip the rema	ainder of Part III and g	o to Part IV.				X Yes No
property transfer property date of transfer basis transfer stock or securities		(a)	(b)		(c)	(d)	
Inventory    Inventory	property						
Other property (not listed under another category)  Property with built-in loss  11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a toreign corporation?  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?  If "Yes," continue to line 12b.  c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transfere foreign corporation?  If "Yes," continue to line 12b. 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  F "Yes," continue to line 12b. If "No," skip line 12d, and go to line 13.  Section C - Intangible Property Subject to Section 367(d)(4)?  Type of property  (a) Date of property Subject to Section 367(d)  Type of property described in sec. 367(d)(4)							
Property with	Inventory						
Totals  11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  12 Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  12 Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  13 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?  14 'Yes, "continue to line 12c. If 'No," skip lines 12c and 12d, and go to line 13.  15 I I mediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  16 'Yes, "continue to line 12d. If 'No," skip line 12d, and go to line 13.  27 I mediately after the transferred loss amount included in gross income as required under section 91  28 I Yes No  29 I Yes No  20 I I' 'Yes, 'Continue to line 12d. If 'No," skip line 12d, and go to line 13.  29 I Line 12d. If 'No," skip line 12d. and go to line 13.  30 I Enter the transferred loss amount included in gross income as required under section 91  31 Did the transferror transfer property described in section 367(d)  32 I Section C - Intangible Property Subject to Section 367(d)  33 Did the transferror transfer property Subject to Section 367(d)  44 I Yes I No  45 I Yes I No  46 I Yes I No  46 I Yes I No  47 I Yes I No  48 I Yes I No  49 I Yes I No  40 I I Yes I No  41 I Yes I No  41 I Yes I No  42 I Yes I No  43 I Yes I No  44 I Yes I No  45 I Yes I No  46 I Yes I No  46 I Yes I No  47 I Yes I No  48 I Yes I No  49 I Yes I No  40 I Yes I No  41 I Yes I No	• • •						
11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  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?  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 transfere foreign corporation?  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 transferre foreign component of transfer property described in section 367(d)  Final Property Subject to Section 367(d)  Property    Queen the transfer of the same and the property subject to Section 367(d)    Property described   Date of transfer   Description of property   Description of transfer	Property with built-in loss						
11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  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?  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 transfere foreign corporation?  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 transferre foreign component of transfer property described in section 367(d)  Final Property Subject to Section 367(d)  Property    Queen the transfer of the same and the property subject to Section 367(d)    Property described   Date of transfer   Description of property   Description of transfer	Totala						
Type of property  (a) Date of transfer  Description of property  Property described in sec. 367(d)(4)  (b) Description of property  Description of property  (c) Useful life Arm's length price on date of transfer  On date of transfer  (d) Cost or other basis  Income inclusion for year of transfer	12 a Were any assets of a far foreign corporation?  If "Yes," go to line 12b  b Was the transferor a decent including a branch that if "Yes," continue to line  c Immediately after the transferee foreign corporate in the transferee foreign corporate in the transferred in the tran	foreign branch (included)	that transferred substantially rded entity) to a specified 10 ines 12c and 12d, and go to estic corporation a U.S. shading 12d, and go to line 13d, in gross income as required ed in section 367(d)(4)?	n disregard y all of the 0%-owned o line 13. areholder w	ded entity) transfer assets of a foreign foreign corporation with respect to the	red to a	Yes No Yes No
Property described in sec. 367(d)(4)  Date of transfer  Description of property  Description of	Section C - Intangible	Property Subje	ct to Section 367(d)			_	_
in sec. 367(d)(4)	• • • • • • • • • • • • • • • • • • • •	Date of	Description of	Useful	Arm's length price	e Cost or other	Income inclusion for
Totals	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
С	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
Sup	pplemental Part III Information Required To Be Reported (see instructions)		
Da	rt IV Additional Information Regarding Transfer of Property (see instructions)		
ı u	/ cartification in or mation regarding frameror of reporty (see matidottons)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before • 000 % (b) After • 132 %		
17	Type of nonrecognition transaction (see instructions) ► IRC SEC. 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.	_	
а	Gain recognition under section 904(f)(3)	Yes	X No
b			X No
С			X No
d	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X No
	If "Yes," complete lines 20b and 20c.		
b		▶\$	
C		• • •	
_	, , , , , , , , , , , , , , , , , , , ,		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	No
21	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	Yes	☐ No
21		Yes	☐ No

# Return by a U.S. Transferor of Property to a Foreign Corporation ▶ Go to www.irs.gov/Form926 for instructions and the latest information.

ON	MB No.	1545-0026	

▶ 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 WILLIAMSBURG COMMUNITY HEALTH FOUNDATION		Identifying numb	<b>er</b> (see instructions)
			X No
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign of	corporation?	Yes	LA No
2 If the transferor was a corporation, complete questions 2a through 2d.	000( )) 1		
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section			
five or fewer domestic corporations?			∐ No
<b>b</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	I	dentifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent formula in the parent corporation.	parent corporation?	Yes	☐ No
Name of parent corporation	EIN	of parent corporat	ion
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 treat complete questions 3a through 3d.	ted as such under sed	ction 367),	
a List the name and EIN of the transferor's partnership.			
Name of partnership		EIN of partnership	
THE TIFF CENTERSTONE FUND, LP	82-0920	0606	
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No
c Is the partner disposing of its entire interest in the partnership?		Yes	X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an e	established		
securities market?		Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)			
4 Name of transferee (foreign corporation)	5	a Identifying numb	er, if any
NORTHWEST FEILONG FUND LTD			
6 Address (including country) 11F KINWICK CENTRE, 32 HOLLYWOOD ROAD	51	<b>b</b> Reference ID nun	nber
HONG KONG K3 HONG KONG		FOREIGNUS	
7 Country code of country of incorporation or organization CJ			
8 Foreign law characterization (see instructions) CORPORATION			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.			(Rev. 11-2018)

Part III Information			instructions)	-1	Page Z
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	01/02/2021		119,526.		
	ainder of Part III and go	to Part IV.	subject to section 36		X Yes No
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					
foreign corporation?  If "Yes," go to line 12  b Was the transferor a continue to least of the stransfered foreign corporation of the stransferee foreign corporation of the stransferee foreign corporation of the stransferred lasses of th	foreign branch (includir b. domestic corporation that is a foreign disregard line 12c. If "No," skip lin transfer, was the dome rporation?	ng a branch that is a foreign at transferred substantiall ded entity) to a specified 1 nes 12c and 12d, and go to estic corporation a U.S. shall be	areholder with respect to the	n branch	Yes       No         Yes       No         Yes       No         Yes       No         Yes       No
Section C - Intangible	e Property Subjec	ct to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's length prid on date of transf		(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
С	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
Sup	plemental Part III Information Required To Be Reported (see instructions)		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 0 28 % (b) After 0 31 %		
17	Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С			X No
d	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X No
	If "Yes," complete lines 20b and 20c.		
b		▶\$	
c	3 ···· - · · · - · · · · · · · · · · · ·		
•	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
		Yes	□ No
21	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	☐ No
21		Yes	☐ No X No

# 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.

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION		Identifying number	<b>er</b> (see instructions)
<ul> <li>1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled fore</li> <li>2 If the transferor was a corporation, complete questions 2a through 2d.</li> </ul>	eign corporation?	Yes	X No
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under s	section 368(c)) by		
five or fewer domestic corporations?		Yes	☐ No
<b>b</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	la	dentifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it If not, list the name and employer identification number (EIN) of the parent corporation.		Yes	☐ No
Name of parent corporation	EIN	of parent corporati	ion
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 complete questions 3a through 3d.	treated as such under sec	tion 367),	
List the name and EIN of the transferor's partnership.	<b>.</b>		
Name of partnership	E	EIN of partnership	
THE TIFF CENTERSTONE FUND, LP	82-0920	606	
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No
		Yes	X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on	n an established		
Part II Transferee Foreign Corporation Information (see instructions)		Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)  4 Name of transferee (foreign corporation)	5a	a Identifying numb	er, if any
AKO EUROPEAN LONG-ONLY FUND LIMITED			
6 Address (including country) 61 CONDUIT STREET	5b	Reference ID num	nber
LONDON W1S 2GB UNITED KINGDOM	F	FOREIGNUS	
7 Country code of country of incorporation or organization CJ			
8 Foreign law characterization (see instructions) CAYMAN ISLANDS EXEMPTED COMPANY			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.		<del></del>	Rev. 11-2018

Part III Information	n Regarding Trans	fer of Property (see	instructio	ns)		r ago <u>z</u>
Section A - Cash  Type of	(a)	(b)		(c)	(d)	(e)
property	Date of transfer	<b>(b)</b> Description of property		(c) Irket value on of transfer	Cost or other basis	Gain recognized on transfer
Cash	06/30/2021		5	14,591.		
	nainder of Part III and go					X Yes No
Section B - Other Pr			subject t			(a)
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) Irket value on of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and		p. ep e. ty			546.6	
securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
(including a branch the lif "Yes," continue to continue to transferee foreign configures," continue to domain Enter the transferred the transferred to the transferred to the transferor transfer "No," skip Section	domestic corporation that is a foreign disregard line 12c. If "No," skip line transfer, was the dome rporation?  line 12d. If "No," skip line 12d. If "No," skip line loss amount included ir insfer property described C and questions 14a three.	at transferred substantiall ded entity) to a specified 1 es 12c and 12d, and go to stic corporation a U.S. shows a 12d, and go to line 13. It gross income as required in section 367(d)(4)?	yn disregarde y all of the a 0%-owned fo o line 13. areholder wi	ed entity) transferre	d to a	YesNoYesNo
Section C - Intangible	le Property Subjec	t to Section 367(d)			Τ	
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(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						
101010					<u>.                                    </u>	

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
С	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
Sup	oplemental Part III Information Required To Be Reported (see instructions)		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
<u>Ра</u>	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before		
	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before		
16 17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	— Yes	X No
16 17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before		X No X No
16 17 18 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes	X No
16 17 18 a b	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes	X No
16 17 18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes	X No X No X No
16 17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes	X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No

## 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.

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION	Identifying numbe	(see instructions)	
<ul> <li>Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corp</li> <li>If the transferor was a corporation, complete questions 2a through 2d.</li> </ul>	oration?	Yes	X No
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 36	68(c)) by		
five or fewer domestic corporations?		Yes	No
b Did the transferor remain in existence after the transfer?		=	No
If not, list the controlling shareholder(s) and their identifying number(s).			
Controlling shareholder	Ide	ntifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parel If not, list the name and employer identification number (EIN) of the parent corporation.	nt corporation?	Yes	☐ No
Name of parent corporation	EIN of	parent corporati	on
<ul> <li>d Have basis adjustments under section 367(a)(4) been made?</li> <li>3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated a</li> </ul>	as such under section	<b>Yes</b>	□ No
complete questions 3a through 3d.			
a List the name and EIN of the transferor's partnership.			
Name of partnership	EIN	l of partnership	
THE TIFF CENTERSTONE FUND, LP	82-09206		
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			X No
c Is the partner disposing of its entire interest in the partnership?		Yes	X No
<b>d</b> Is the partner disposing of an interest in a limited partnership that is regularly traded on an establishment	olished		
securities market?  Part II Transferee Foreign Corporation Information (see instructions)		Yes	X No
	Τ		
4 Name of transferee (foreign corporation)	5a I	dentifying numb	er, if any
AKO GLOBAL LONG-ONLY FUND LIMITED		2.6	
6 Address (including country) 61 CONDUIT STREET	5b	Reference ID num	ber
LONDON W1S 2GB UNITED KINGDOM	₽0	REIGNUS	
7 Country code of country of incorporation or organization CJ	FO	TELGIOS	
8 Foreign law characterization (see instructions) CAYMAN ISLANDS EXEMPTED COMPANY			
9 Is the transferee foreign corporation a controlled foreign corporation?		X Yes	No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.		<del></del>	Rev. 11-2018)

Part III Information	Regarding Trans	sfer of Property (see	instructions)		
Section A - Cash  Type of	(a)	(b) Description of	(c) Fair market value on	(d)	(e)
property	Date of transfer	Description of property	date of transfer	Cost or other basis	Gain recognized on transfer
Cash	06/30/2021		102,918.		
10 Was cash the only pro-	ainder of Part III and go				X Yes No
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	1701.1010	ріорону			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					
(including a branch that If "Yes," continue to lince Immediately after the stransferee foreign corp. If "Yes," continue to lince Immediately after the transferred left.  13 Did the transferor trans. If "No," skip Section Communication.	foreign branch (including to the composition of the	hat transferred substantially ded entity) to a specified 10 nes 12c and 12d, and go to estic corporation a U.S. shame 12d, and go to line 13. In gross income as required in section 367(d)(4)?	n disregarded entity) transion disregarded entity) transion of the assets of a foreign corporate line 13.  Areholder with respect to the discrete of the second of the sec	ferred to a  gn branch tion?  ne	Yes       No         Yes       No         Yes       No         Yes       No         Yes       No
Section C - Intangible	Property Subject	ct to Section 367(d)			
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) (d) Useful Arm's length point on date of trans	rice Cost or other sfer basis	(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)					
Totals					Form <b>936</b> (Poy. 11 2019)

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
С	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
Sup	pplemental Part III Information Required To Be Reported (see instructions)		
Da	rt IV Additional Information Regarding Transfer of Property (see instructions)		
га	Additional information negations transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before • 0 2 8 % (b) After • 0 2 7 %		
17	Type of nonrecognition transaction (see instructions) ► IRC SEC. 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b			X No
С			X No
d	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X 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)	<b>S</b>	
С	3 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	▶\$	
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		□ No
c 21			☐ No
	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)?		☐ No X No

# Department of the Treasury Internal Revenue Service

# 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.

OMB	No.	1545-0026

Part I U.S. Transferor Information (see instructions)					
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION		Identifying	number	(see ins	ructions)
<ul> <li>Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation.</li> <li>If the transferor was a corporation, complete questions 2a through 2d.</li> <li>If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section).</li> </ul>			'es	X	No
			'es		No
five or fewer domestic corporations?				H	
b Did the transferor remain in existence after the transfer?		L	'es	ш	No
If not, list the controlling shareholder(s) and their identifying number(s).					
Controlling shareholder	- 1	dentifying nur	nber		
c If the transferor was a member of an affiliated group filing a consolidated return, was it the part of not, list the name and employer identification number (EIN) of the parent corporation.	arent corporation?	🗆 Ү	es es		No
Name of parent corporation	EIN	of parent corp	ooratio	n	
d Have basis adjustments under section 367(a)(4) been made?		\( \sqrt{Y}	'es		No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treate complete questions 3a through 3d.	ed as such under se	ction 367),			
a List the name and EIN of the transferor's partnership.					
Name of partnership		EIN of partner	ship		
THE TIFF KEYSTONE FUND, LP	76-084	7743			
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		🔲 Y	'es	X	No
c Is the partner disposing of its entire interest in the partnership?		🔲 Y	'es	X	No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an es					
securities market?		🔲 Y	'es	X	No
Part II Transferee Foreign Corporation Information (see instructions)					
4 Name of transferee (foreign corporation)	5	a Identifying	number	, if ar	ıy
ALTOR FUND IV (NO.2) AB		98-14648	11		
6 Address (including country) POSTBOX 16116 STOCKHOLM SWEDEN	5	<b>b</b> Reference II	) numbe	er	
7 Country code of country of incorporation or organization SW					
8 Foreign law characterization (see instructions) PRIVATE LIMITED CORPORATION					
9 Is the transferee foreign corporation a controlled foreign corporation?			'es	X	No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.			<b>926</b> (Re		

	Regarding Trans	sfer of Property (see	instructi	ons)		<u> </u>
Section A - Cash						
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	<b>(d)</b> Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2021			159,638.		
10 Was cash the only pro If "Yes," skip the rema  Section B - Other Pro	ainder of Part III and g					X Yes No
Type of property	(a) Date of	(b) Description of	Fair m	(c) narket value on	(d) Cost or other	(e) Gain recognized on
Stock and	transfer	property	dati	e of transfer	basis	transfer
securities Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
(including a branch that If "Yes," continue to limic continue to limic transferee foreign corplif "Yes," continue to limic document that transferred left and the transferred left and the transferor transfer "No," skip Section Continue to limic transferor transfero	foreign branch (includ foreign branch (includ foreign branch (includ at is a foreign disrega ne 12c. If "No," skip litransfer, was the domporation?  ne 12d. If "No," skip litransfer included asfer property described and questions 14a the	that transferred substantiall rded entity) to a specified 1 nes 12c and 12d, and go to estic corporation a U.S. shame 12d, and go to line 13. in gross income as required in section 367(d)(4)?	n disregard y all of the 0%-owned o line 13. areholder v	assets of a foreign foreign corporation	rred to a [  n branch  nn? [	Yes No Yes No Yes No Yes No Yes No
Section C - Intangible	Property Subje	ct to Section 367(d)	_			
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length pric on date of transfe		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						Form <b>926</b> (Rev. 11-2018)

21	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  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   X No   Rev. 11-2018)
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
_	· · ·	L res	∟ No
		Yes	
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	▶\$	
	If "Yes," complete lines 20b and 20c.		
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	Yes	X No
19	Did this transfer result from a change in entity classification?		X No
d	Exchange gain under section 987		X No
	1		X No
b	Gain recognition under section 904(f)(5)(F)		X No
а	Gain recognition under section 904(f)(3)		X No
18	Indicate whether any transfer reported in Part III is subject to any of the following.		77
17	Type of nonrecognition transaction (see instructions) ► IRC SEC. 351		
	(a) Before037_ % (b) After037_ %		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
	(555		
Pai	rt IV Additional Information Regarding Transfer of Property (see instructions)		
Sup	plemental Part III Information Required To Be Reported (see instructions)		
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	□ No
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any		
	Regulations section 1.367(d)-1(c)(3)(ii)  \$\bigs\\$\$		
-	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in		
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable		
Ü	1.367(d)-1(c)(3)(ii) for any intangible property?	Yes	No
	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	1es	140
h	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?		□ No
та	reasonably anticipated to exceed 20 years?	Yes	No
14 a	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life		

# 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.

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
WILLIAMSBURG COMMUNITY HEALTH FOUNDATION	
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporati	on? Yes X 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>b</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
a. If the transferer use a member of an efficiency group filing a consolidated vature, use it the parent against	prporation? Yes No
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent co If not, list the name and employer identification number (EIN) of the parent corporation.	prporation? Fes I No
- Thot, list the name and employer identification number (Liny or 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 su	nch 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
MILE MILE KENOMONE BUND ID	76 0047743
·	76-0847743
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	
c Is the partner disposing of its entire interest in the partnership?	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establish	
Part II   Transferee Foreign Corporation Information (see instructions)	Yes X No
Name of transferee (foreign corporation)	5a Identifying number, if any
1 Name of transferee (foreign corporation)	3a Identifying flumber, if any
ASOF IV FEEDER FUND L.P.	
6 Address (including country)	5b Reference ID number
TRAFALGAR COURT, LES BANQUES,	ob Meloronee ib Hamber
ST PETER PORT GY1 3QL GUERNSEY	FOREIGNUS
7 Country code of country of incorporation or organization	
GK	
Foreign law characterization (see instructions)	
LIMITED PARTNERSHIP	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.	Form <b>926</b> (Rev. 11-2018)

Part III Information				N	Page Z
Section A - Cash	<u> </u>	. , (	,		
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2021		142,614.		
10 Was cash the only pro If "Yes," skip the rema  Section B - Other Pro	ainder of Part III and go	to Part IV.	subject to section 36		X Yes No
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					
(including a branch the If "Yes," continue to lice Immediately after the transferee foreign corplif "Yes," continue to lice Immediately after the transferred Immediately after	foreign branch (including the content of the composition of the compos	ng a branch that is a foreign abranch that is a foreign at transferred substantiall ded entity) to a specified 1 nes 12c and 12d, and go to estic corporation a U.S. shows a line 12d, and go to line 13. In gross income as required d in section 367(d)(4)?	y all of the assets of a foreig 0%-owned foreign corporation oline 13. areholder with respect to the	rred to a [  n branch  on? [	Yes No Yes No Yes No Yes No Yes No
Section C - Intangible	Property Subject	et to Section 367(d)		_	
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life Arm's length pri on date of transi		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)					
Totals					Form <b>926</b> (Rev. 11-2018)

			Rev. 11-2018)
	covered by section 367(e)(1)? See instructions		X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		<b>T</b>
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	No
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	▶\$	
	If "Yes," complete lines 20b and 20c.		
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
d	Exchange gain under section 987		X No
			X No
b			X No
а	Gain recognition under section 904(f)(3)		X No
18	Indicate whether any transfer reported in Part III is subject to any of the following.		77
17	Type of nonrecognition transaction (see instructions) ► IRC SEC. 351		
	(a) Before239 % (b) After239 %		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
Pai	rt IV Additional Information Regarding Transfer of Property (see instructions)		
Sup	plemental Part III Information Required To Be Reported (see instructions)		
-	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	No
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any		
	Regulations section 1.367(d)-1(c)(3)(ii) ▶\$		
	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in		
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable	<del></del>	
	1.367(d)-1(c)(3)(ii) for any intangible property?	Yes	☐ No
	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section		
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?		□ No
-	reasonably anticipated to exceed 20 years?	Yes	☐ No
14 a	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life		

# 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.

OMB No. 1545-0026

Part I U.S. Transferd	or information (see instructions)				
Name of transferor WILLIAMSBURG CO	e of transferor LLIAMSBURG COMMUNITY HEALTH FOUNDATION				
1 Is the transferee a specif	ied 10%-owned foreign corporation that is not a controlled foreign	n corporation?	Yes	X No	
	proprietion, complete questions 2a through 2d.				
	ion 361(a) or (b) transfer, was the transferor controlled (under sec	ction 368(c)) by			
five or fewer domestic co		* ** *	Yes	☐ No	
<b>b</b> Did the transferor remain	n in existence after the transfer?			☐ No	
	shareholder(s) and their identifying number(s).				
	Controlling shareholder	Id	entifying number		
	ember of an affiliated group filing a consolidated return, was it the employer identification number (EIN) of the parent corporation.	e parent corporation?	Yes	No No	
	Name of parent corporation	EIN o	of parent corporati	on	
	under section 367(a)(4) been made?  artner in a partnership that was the actual transferor (but is not tre			No No	
complete questions 3a th	hrough 3d.				
a List the name and EIN of	f the transferor's partnership.				
	Name of partnership	E	IN of partnership		
THE TIFF KEYSTO	ONE FUND, LP	76-0847	743		
	ts pro rata share of gain on the transfer of partnership assets?			X No	
	of its entire interest in the partnership?		Yes	X No	
<b>d</b> Is the partner disposing of	of an interest in a limited partnership that is regularly traded on a	n established			
securities market?	reign Corporation Information (see instructions)		Yes	X No	
4 Name of transferee (forei	· ,	5a	Identifying number	er, if any	
	HNOLOGIES LIMITED				
6 Address (including count	**	5b	Reference ID num	ber	
6 MITRE PASSAGE		_	ODETONIC		
	N UNITED KINGDOM	<u>  F</u>	OREIGNUS		
UK	of incorporation or organization				
8 Foreign law characterizat	tion (see instructions)				
9 Is the transferee foreign	corporation a controlled foreign corporation?		X Yes	☐ No	
124531 04-01-21 LHA For Par	perwork Reduction Act Notice, see separate instructions.		Form <b>926</b> (F	Rev. 11-2018)	

Part III Information		fer of Property (see				Page 2
Section A - Cash	riegarding mans	iei oi i iopeity (see	II ISLI UCLIC	) i i s)		
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash	11/10/2020			169,441.		
10 Was cash the only pro If "Yes," skip the rema  Section B - Other Pro	inder of Part III and go					X Yes No
Type of property	(a) Date of transfer	(b)  Description of property	Fair ma	(c) arket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and securities		p p y				
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
<ul> <li>12 a Were any assets of a fivereign corporation? If "Yes," go to line 12b b Was the transferor a dincluding a branch that if "Yes," continue to line c Immediately after the transferee foreign corporate if "Yes," continue to line d Enter the transferred to Did the transferor transferor</li></ul>	oreign branch (including the comment of the comment	nat transferred substantially ded entity) to a specified 1 es 12c and 12d, and go to stic corporation a U.S. shade 12d, and go to line 13. In gross income as required in section 367(d)(4)?	n disregard y all of the a 0%-owned o line 13. areholder w	led entity) transferre assets of a foreign b foreign corporation? with respect to the	d to a	YesNoYesNoYesNoYesNoYesNo
Section C - Intangible	Property Subjec	t to Section 367(d)	1 1		Γ	T
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						Form <b>926</b> (Rev. 11-2018)

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?		☐ No
С	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
Sup	plemental Part III Information Required To Be Reported (see instructions)		
Pa	rt 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 1.077 % (b) After 1.077 %		
17	Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351	_	
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)		X No
С	Recapture under section 1503(d)		X No
	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	<b>—</b>	X No
<b></b> 0 u	If "Yes," complete lines 20b and 20c.		[ <u></u> ] 110
h	•	• ¢	
	3 1 3 (7 (7	Ψ	
С	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)?	. L Yes	No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		<b>v</b>
	covered by section 367(e)(1)? See instructions	Yes	X No
		Form <b>926</b> (F	Rev. 11-2018)

### Department of the Treasury Internal Revenue Service

# 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.

OMB	No.	1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION		Identifying numbe	*f (see instructions)
<ul> <li>Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation.</li> <li>If the transferor was a corporation, complete questions 2a through 2d.</li> <li>If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368) five or fewer domestic corporations?</li> </ul>	(c)) by	Yes	X No
b Did the transferor remain in existence after the transfer?		=	□ No
		res	NO
If not, list the controlling shareholder(s) and their identifying number(s).			
Controlling shareholder	lder	ntifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent of If not, list the name and employer identification number (EIN) of the parent corporation.	corporation?	Yes	No No
Name of parent corporation	EIN of p	parent corporati	on
d Have basis adjustments under section 367(a)(4) been made?		Yes	No No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as complete questions 3a through 3d.	such under section	n 367),	
a List the name and EIN of the transferor's partnership.			
Name of partnership	EIN	l of partnership	
THE TIFF KEYSTONE FUND, LP	76-08477	43	
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No
c Is the partner disposing of its entire interest in the partnership?		Yes	X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establis	shed		
securities market?		Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)			
Name of transferee (foreign corporation)	5a   6	dentifying numbe	er, if any
FORT GLOBAL OFFSHORE FUND, SPC			
6 Address (including country) PO BOX 309 UGLAND HOUSE	<b>5b</b>   F	Reference ID num	ber
GEORGE TOWN, GRAND CAYMAN KY1-1104 CAYMAN ISLANDS	FO	REIGNUS	
7 Country code of country of incorporation or organization CJ	10	THIGHOR	
8 Foreign law characterization (see instructions) CORPORATION			
9 Is the transferee foreign corporation a controlled foreign corporation?	<u></u>	Yes	X No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.			Rev. 11-2018)

		COMMUNITY HEA				Page 2
Part III   Information Section A - Cash	Regarding Trans	sfer of Property (see in	nstructio	ris)		
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) rket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	01/02/2020		1	73,093.		
	ainder of Part III and g	o to Part IV.				☑ Yes
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) rket value on 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						
foreign corporation?  If "Yes," go to line 12l  b Was the transferor a continue to lift "Yes," continue to lift transferee foreign corporate foreign corporate for the transferee foreign corporate foreign corpor	b. domestic corporation t lat is a foreign disregar line 12c. If "No," skip line transfer, was the dom poration? line 12d. If "No," skip line 12d. If "No," skip lines amount included in the domestic line 12d. If "No," skip lines amount included in the late.	that transferred substantially rded entity) to a specified 10 nes 12c and 12d, and go to lestic corporation a U.S. sharmen 12d, and go to line 13. in gross income as required the d in section 367(d)(4)?	all of the a %-owned fo line 13. reholder wi	ssets of a foreign boreign corporation?	ranch	Yes No Yes No Yes No No
Section C - Intangible	e Property Subje	ct to Section 367(d)	, ,			
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(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						
					F	orm <b>926</b> (Rev. 11-2018)

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
С	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 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
Sup	plemental Part III Information Required To Be Reported (see instructions)		
Pa	rt 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 $.011 \%$ (b) After $.015 \%$		
17	Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.	_	
а	Gain recognition under section 904(f)(3)	Yes	X No
b			X No
С			X No
d	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X No
	If "Yes," complete lines 20b and 20c.		
b		<b>S</b>	
c		. F T	
J	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	
			No
21		L 1es	☐ 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 X No

# 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.

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
WILLIAMSBURG COMMUNITY HEALTH FOUNDATION	
Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?	Yes X 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?	
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 corporat If not, list the name and employer identification number (EIN) of the parent corporation.	ion? Yes No
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 und complete questions 3a through 3d.	der section 367),
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
·	0847743
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	
c Is the partner disposing of its entire interest in the partnership?	Yes X No
<b>d</b> Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	
securities market?	Yes X No
Part II Transferee Foreign Corporation Information (see instructions)	Te 11
4 Name of transferee (foreign corporation)	5a Identifying number, if any
H.I.G. BRAZIL & LATIN AMERICA PARTNERS FEEDER FUND A, L	98-1249091
6 Address (including country) 1450 BRICKELL AVENUE, 31ST FLOOR MIAMI, FL 33131	5b Reference ID number
7 Country code of country of incorporation or organization	1
8 Foreign law characterization (see instructions)	
PARTNERSHIP	▼ v
9 Is the transferee foreign corporation a controlled foreign corporation?  124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.	X Yes No Form 926 (Rev. 11-2018)

Part III Information	Regarding Trans	sfer of Property (see	instructions)		r ugo z
Section A - Cash Type of	_ (a)	(b) Description of	(c) Fair market value on	(d)	(e)
property	Date of transfer	Description of property	date of transfer	Cost or other basis	Gain recognized on transfer
Cash	12/31/2021		142,391.		
10 Was cash the only pro If "Yes," skip the rema	ainder of Part III and go				X Yes No
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	1701.1010	property		240.0	110110101
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					
(including a branch that If "Yes," continue to linct Immediately after the transferee foreign corp. If "Yes," continue to linct Immediately after the transferred look Immediately after the transferred look Immediately Imme	foreign branch (including to the composition of the	hat transferred substantially ded entity) to a specified 10 nes 12c and 12d, and go to estic corporation a U.S. shame 12d, and go to line 13. In gross income as required in section 367(d)(4)?	n disregarded entity) transformers, all of the assets of a foreign corporation line 13.  Areholder with respect to the	erred to a  gn branch ion?  e	Yes No Yes No Yes No Yes No Yes No
Section C - Intangible	Property Subject	ct to Section 367(d)			
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property	(c) (d) Useful Arm's length pr on date of trans	(e) ice Cost or other ifer basis	Income inclusion for year of transfer
Property described in sec. 367(d)(4)					
Totals					Form <b>926</b> (Poy. 11 2019)

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
	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
Sup	oplemental Part III Information Required To Be Reported (see instructions)		
Da	N/ Additional Information Department Transfer of Dremarks (and instructions)		
Pa	rt 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.		
	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before194_% (b) After194_%		
17	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before194_ % (b) After194_ %  Type of nonrecognition transaction (see instructions) > IRC SEC. 351		
17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before194 % (b) After194 %  Type of nonrecognition transaction (see instructions) > IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.		
	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before194 % (b) After194 %  Type of nonrecognition transaction (see instructions) > IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)	Yes	X No
18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes	X No
18 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	=	X No
18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes	X No X No X No
18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes	X No
18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before194_ % (b) After194_ %  Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987	Yes Yes Yes	X No X No X No
18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before194_ % (b) After194_ %  Type of nonrecognition transaction (see instructions) > IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?	Yes Yes Yes Yes Yes	X No X No X No X No
18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes	X No X No X No X No
18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before194_ % (b) After194_ %  Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  If "Yes," complete lines 20b and 20c.  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	Yes Yes Yes Yes Yes Yes	X No X No X No X No
18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before194_ % (b) After194_ %  Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  If "Yes," complete lines 20b and 20c.  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶	Yes Yes Yes Yes Yes Yes	X No X No X No X No
18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before194_ % (b) After194_ %  Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  If "Yes," complete lines 20b and 20c.  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)  Did the domestic corporation not recognize gain or loss on the distribution of property because the	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No
18 a b c d 19 20 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No

# 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.

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION		Identifying numbe	(see instructions)
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation that is not a controlled foreign corporation.	ation?	Yes	X 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?			∟ No
<b>b</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	lder	ntifying 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.	oorporation:		
Name of parent corporation	EIN of	parent corporati	on
<ul> <li>d Have basis adjustments under section 367(a)(4) been made?</li> <li>3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as complete questions 3a through 3d.</li> </ul>	such under sectio	n 367),	□ No
a List the name and EIN of the transferor's partnership.			
Name of partnership	EIN	of partnership	
THE TIFF KEYSTONE FUND, LP	76-08477		
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			X No
c Is the partner disposing of its entire interest in the partnership?		Yes	X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establis	shed		
securities market?		Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)			
4 Name of transferee (foreign corporation)	5a l	dentifying numb	er, if any
HELIKON LONG SHORT EQUITY FUND ICAV			
6 Address (including country)	5b F	Reference ID num	ber
33 SIR JOHN			
DUBLIN IRELAND	FO	REIGNUS	
7 Country code of country of incorporation or organization EI			
8 Foreign law characterization (see instructions) CORPORATION			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.			Rev. 11-2018)

	Part III Information Regarding Transfer of Property (see instructions)								
Section A - Cash									
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) arket value on of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer			
Cash									
10 Was cash the only pro If "Yes," skip the rema	ainder of Part III and g					Yes X No			
Section B - Other Pro	<del> </del>	n intangible property s	subject						
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) arket value on of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer			
Stock and securities									
Inventory									
Other property (not listed under another category)	01/02/2021		(	525,309.		625,309.			
Property with									
built-in loss									
Totals			(	525,309.		625,309.			
Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  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?  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?  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  Yes  In No," skip Section C and questions 14a through 15.									
Section C - Intangible		ect to Section 307 (u)	1 1						
Type of property	(a) Date of transfer	(b) Description of property		(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer			
			+ +			+			
Property described in sec. 367(d)(4)									
Totals					F	form <b>926</b> (Rev. 11-2018)			

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
	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	<del></del>	
	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
_			
Sup	oplemental Part III Information Required To Be Reported (see instructions)		
Da	rt IV Additional Information Regarding Transfer of Property (see instructions)		
ı a	Additional information regarding transfer of Froperty (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
10	(a) Before • 088 % (b) After • 088 %		
17	Type of nonrecognition transaction (see instructions) ► IRC SEC. 351		
18			
	Indicate whether any transfer reported in Dart III is subject to any of the following		
a	Indicate whether any transfer reported in Part III is subject to any of the following.	□ v <sub>ee</sub>	Y No
b	Gain recognition under section 904(f)(3)	Yes	X No
	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d)	Yes Yes	X No
c d	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987	Yes Yes Yes	X No X No X No
c d 19	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification?	Yes Yes Yes Yes Yes	X No X No X No X No
c d 19	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	Yes Yes Yes	X No X No X No
c d 19	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) If "Yes," complete lines 20b and 20c.	Yes Yes Yes Yes Yes Yes	X No X No X No X No
c d 19	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) If "Yes," complete lines 20b and 20c.	Yes Yes Yes Yes Yes Yes	X No X No X No X No
c d 19 20 a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) If "Yes," complete lines 20b and 20c. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No
c d 19 20 a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) If "Yes," complete lines 20b and 20c. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) 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 Yes Yes Yes Yes Yes	X No X No X No X No
c d 19 20 a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) If "Yes," complete lines 20b and 20c. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) Did the domestic corporation not recognize gain or loss on the distribution of property because the	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No X No No
c d 19 20 a b c	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) If "Yes," complete lines 20b and 20c. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) 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 Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No

### 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.

OMB No. 1545-0026

Attachment Sequence No. **128** 

Pa	rt I U.S. Transferor Information (see instructions)			
Nam	e of transferor		Identifying numbe	er (see instructions)
W.	ILLIAMSBURG COMMUNITY HEALTH FOUNDATION			,
1	Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?	ı	Yes	X No
2	If the transferor was a corporation, complete questions 2a through 2d.			
ے a	If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by	,		
а			□ Vaa	No
	five or fewer domestic corporations?			=
b	Did the transferor remain in existence after the transfer?		L Yes	No
	If not, list the controlling shareholder(s) and their identifying number(s).			
	Controlling shareholder	ldei	ntifying number	
С	If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corpo	ration?	Yes	L No
	If not, list the name and employer identification number (EIN) of the parent corporation.			
	Name of parent corporation	EIN of	parent corporati	on
	ttame of paront oof portainen.		pa 0 00. po. a	
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 sectio	n 367),	
	complete questions 3a through 3d.			
а	List the name and EIN of the transferor's partnership.			
	Name of partnership	FIN	l of partnership	
	Nume of partitioning	<b>L</b>	l of partifership	
		<u>-08477</u>		
b	Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			X No
С	Is the partner disposing of its entire interest in the partnership?		Yes	X No
d	Is the partner disposing of an interest in a limited partnership that is regularly traded on an established			
	securities market?		Yes	X No
Pa	rt II Transferee Foreign Corporation Information (see instructions)			
4	Name of transferee (foreign corporation)	5a I	dentifying numb	<b>er</b> , if any
K.	EEL CAPITAL S.A., SICAV-SIF - FOGHORN X2			
6	Address (including country)	5b F	Reference ID num	ber
3,	RUE GABRIEL LIPPMANN L-5365			
-	NSBACH LUXEMBOURG	FO	REIGNUS	
7	Country code of country of incorporation or organization	•		
L	, , , , , , , , , , , , , , , , , , , ,			
8	Foreign law characterization (see instructions)			
	DRPORATION			
9	Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No

124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.

Form 926 (Rev. 11-2018)

Part III Information	n Regarding Trans	fer of Property (see	instructio	ons)		1 ago <u>2</u>
Section A - Cash  Type of	_ (a)	(b) Description of	T	(c) arket value on	(d)	(e)
property	Date of transfer	Description of property	date	of transfer	Cost or other basis	Gain recognized on transfer
Cash	07/02/2021		8	312,902.		
10 Was cash the only pr If "Yes," skip the rem	roperty transferred? nainder of Part III and go	to Part IV.				X Yes No
Section B - Other Pr			subject	- · · · ·		()
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) arket value on of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
 Totals				+		
(including a branch the lif "Yes," continue to continue to transferee foreign configures," continue to do the transferred the transferred the transferred to the transferor transferor transferor transfer transfer transfer	domestic corporation that is a foreign disregard line 12c. If "No," skip line transfer, was the dome proration?	nat transferred substantiall ded entity) to a specified 1 es 12c and 12d, and go to stic corporation a U.S. shows the 12d, and go to line 13. In gross income as required the discontinuous and section 367(d)(4)?	ly all of the a 0%-owned f o line 13. areholder w	assets of a foreign boreign corporation?	oranch	Yes No Yes No Yes No Yes No
Section C - Intangible	le Property Subjec	t to Section 367(d)				_
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(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						
					F	orm <b>926</b> (Rev. 11-2018)

	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)?  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  X No  Rev. 11-2018)
c 21	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
С	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	☐ No
С			
	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	▶\$	
	If "Yes," complete lines 20b and 20c.		
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
d	Exchange gain under section 987	Yes	X No
	1		X No
b	• (// // //		X No
а	Gain recognition under section 904(f)(3)		X No
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
17	Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351		
	(a) Before 1.228 % (b) After 1.228 %		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
Pai	rt IV Additional Information Regarding Transfer of Property (see instructions)		
Sup	plemental Part III Information Required To Be Reported (see instructions)		
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	☐ No
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any		
	Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$		
	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in		
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable		
	1.367(d)-1(c)(3)(ii) for any intangible property?	Yes	☐ No
С	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section		
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?		☐ No
	reasonably anticipated to exceed 20 years?	Yes	☐ No
	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life		
14 a			

# 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.

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION		Identifying numbe	(see instructions)
<ul> <li>Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporate</li> <li>If the transferor was a corporation, complete questions 2a through 2d.</li> </ul>	ion?	Yes	X No
	W I		
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c	•		
five or fewer domestic corporations?			∐ 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	lder	ntifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent could not, list the name and employer identification number (EIN) of the parent corporation.	orporation?	Yes	No No
Name of parent corporation	EIN of p	oarent corporati	on
<ul> <li>d Have basis adjustments under section 367(a)(4) been made?</li> <li>3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as so complete questions 3a through 3d.</li> <li>a List the name and EIN of the transferor's partnership.</li> </ul>	uch under section	Yes	□ No
Name of partnership	EIN	of partnership	
THE TIFF KEYSTONE FUND, LP	76-08477	43	
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No
c Is the partner disposing of its entire interest in the partnership?			X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establish			
securities market?	ica	Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)		103	110
4 Name of transferee (foreign corporation)	5a lo	dentifying numb	er, if any
LIGHT STREET TUNGSTEN OFFHSORE FUND, LTD			
6 Address (including country) CAYMAN CORPORATE CENTRE, 27 HOSPITAL ROAD	5b F	Reference ID num	ber
GEORGE TOWN, GRAND CAYMAN KY1-9008 CAYMAN ISLANDS	FO:	REIGNUS	
<ul><li>7 Country code of country of incorporation or organization</li><li>CJ</li></ul>			
8 Foreign law characterization (see instructions) CFC			
9 Is the transferee foreign corporation a controlled foreign corporation?		X Yes	□ No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.			Rev. 11-2018)

Part III Information	Regarding Trans	sfer of Property (see	instructi	ons)		У
Section A - Cash						
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) arket value on e of transfer	<b>(d)</b> Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash	05/02/2021			625,309.		
10 Was cash the only pro- If "Yes," skip the rema	ainder of Part III and g					X Yes No
Section B - Other Pro	(a) Date of	(b)  Description of		(c) arket value on	(d) Cost or other	<b>(e)</b> Gain recognized on
property	transfer	property		e of transfer	basis	transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
(including a branch the If "Yes," continue to lie c Immediately after the transferee foreign corp If "Yes," continue to lie d Enter the transferred I	lomestic corporation tat is a foreign disregal ne 12c. If "No," skip litransfer, was the domooration?  ne 12d. If "No," skip lites amount included sfer property describe	that transferred substantiall rded entity) to a specified 1 nes 12c and 12d, and go to estic corporation a U.S. shame 12d, and go to line 13. in gross income as required in section 367(d)(4)?	y all of the 0%-owned o line 13. areholder v	assets of a foreign foreign corporation with respect to the	branch	Yes No Yes No Yes No Yes No
Section C - Intangible	Property Subje	ct 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 transfe		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						Form <b>926</b> (Rev. 11-2018)

116 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before1.313_ % (b) After1.313_ %  Type of nonrecognition transaction (see instructions) > IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  If "Yes," complete lines 20b and 20c.  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)  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)?  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 Yes Yes Yes Yes Yes Yes Yes	X No
116 117 118 a b c d 119 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 1.313 % (b) After 1.313 %  Type of nonrecognition transaction (see instructions) IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  If "Yes," complete lines 20b and 20c.  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)  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	X No X No X No X No X No X No No
116 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 1.313 % (b) After 1.313 %  Type of nonrecognition transaction (see instructions) ► IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  If "Yes," complete lines 20b and 20c.  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)  Did the domestic corporation not recognize gain or loss on the distribution of property because the	Yes Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No
116 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 1.313 % (b) After 1.313 %  Type of nonrecognition transaction (see instructions) ► IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  If "Yes," complete lines 20b and 20c.  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)  Did the domestic corporation not recognize gain or loss on the distribution of property because the	Yes Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No
116 117 118 a b c d 119 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 1.313 % (b) After 1.313 %  Type of nonrecognition transaction (see instructions) ► IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  If "Yes," complete lines 20b and 20c.  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No
116 117 118 a b c d 119 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 1.313 % (b) After 1.313 %  Type of nonrecognition transaction (see instructions) ► IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  If "Yes," complete lines 20b and 20c.	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 1.313 % (b) After 1.313 %  Type of nonrecognition transaction (see instructions) ► IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?	Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 1.313 % (b) After 1.313 %  Type of nonrecognition transaction (see instructions) ► IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987	Yes Yes Yes	X No X No X No X No
16 17 18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 1.313 % (b) After 1.313 %  Type of nonrecognition transaction (see instructions) ► IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)	Yes Yes	X No X No X No
16 17 18 a b	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 1.313 % (b) After 1.313 %  Type of nonrecognition transaction (see instructions) IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)	Yes	X No
16 17 18 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before1.313_ % (b) After1.313_ %  Type of nonrecognition transaction (see instructions) > IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)		X No
16 17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before1.313_ % (b) After1.313_ %  Type of nonrecognition transaction (see instructions) > IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)		
16 17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 1.313 % (b) After 1.313 %  Type of nonrecognition transaction (see instructions) IRC SEC. 351		
	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before $1.313\%$ (b) After $1.313\%$		
	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
Pai	rt IV Additional Information Regarding Transfer of Property (see instructions)		
Pai	rt IV Additional Information Regarding Transfer of Property (see instructions)		
oup	plemental Part III Information Required To Be Reported (see instructions)		
٠	planeautal Doubli III Information Dominal To Do Dominal ( 1997)		
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	No
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any		
	Regulations section 1.367(d)-1(c)(3)(ii)  \$\)		
	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in		
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable		
	1.367(d)-1(c)(3)(ii) for any intangible property?	Yes	No
	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section		
	• • • • • • • • • • • • • • • • • • • •	Yes	No
С	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?		= "
С	the contract of the contract o	Yes	No
b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?	Yes	No

# 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.

OMB	No.	1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION		Identifying number	<b>er</b> (see instructions)
<ul> <li>Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign</li> <li>If the transferor was a corporation, complete questions 2a through 2d.</li> </ul>	n corporation?	Yes	X No
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under sec	tion 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).			140
Controlling shareholder	Id	lentifying number	
			_
c If the transferor was a member of an affiliated group filing a consolidated return, was it the If not, list the name and employer identification number (EIN) of the parent corporation.	parent corporation?	Yes	∟ No
Name of parent corporation	EIN o	of parent corporati	on
<ul> <li>d Have basis adjustments under section 367(a)(4) been made?</li> <li>3 If the transferor was a partner in a partnership that was the actual transferor (but is not tree.)</li> </ul>		Yes tion 367),	☐ No
complete questions 3a through 3d.			
<b>a</b> List the name and EIN of the transferor's partnership.			
Name of partnership	E	IN of partnership	
THE TIFF KEYSTONE FUND, LP	76-0847	743	
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No
			X No
<b>d</b> Is the partner disposing of an interest in a limited partnership that is regularly traded on ar			
securities market?		Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)			
4 Name of transferee (foreign corporation)	5a	Identifying numb	er, if any
NEO IVY CAPITAL OFFSHORE LTD			
6 Address (including country) 27 HOSPITAL ROAD	5b	Reference ID num	ber
GEORGE TOWN, GRAND CAYMAN KY1-9008 CAYMAN ISLAND	<u>s</u>   F	OREIGNUS	
7 Country code of country of incorporation or organization CJ			
8 Foreign law characterization (see instructions) EXEMPTED COMPANY			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.	<u></u>		Rev. 11-2018
		1 OIIII <b>JEU</b> (1	

Part III Information	Regarding Trans	sfer of Property (see	instructi	ons)		<u> </u>
Section A - Cash						
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) arket value on e of transfer	<b>(d)</b> Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2021			395,738.		
10 Was cash the only pro If "Yes," skip the rema	ainder of Part III and g					X Yes No
Section B - Other Pro	(a) Date of	(b)  Description of		(c) arket value on	(d) Cost or other	(e) Gain recognized on
property	transfer	property		e of transfer	basis	transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
(including a branch that If "Yes," continue to linct Immediately after the stransferee foreign corp. If "Yes," continue to linct Immediately after the transferred letter the transferr	foreign branch (includ 	that transferred substantiall rded entity) to a specified 1 nes 12c and 12d, and go to estic corporation a U.S. shame 12d, and go to line 13. in gross income as required in section 367(d)(4)?	n disregard y all of the 0%-owned o line 13. areholder v	ded entity) transfer assets of a foreign foreign corporatio with respect to the	red to a [	Yes       No         Yes       No         Yes       No         Yes       No
Section C - Intangible	Property Subje	ct to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pric on date of transfe		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						Form <b>926</b> (Rev. 11-2018)

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.
	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
_			
Sup	oplemental Part III Information Required To Be Reported (see instructions)		
Do	rt IV Additional Information Regarding Transfer of Property (see instructions)		
Га	Additional information Regarding Transfer of Property (See Instructions)		
46	Enter the transferor's interest in the transferor fereign corneration before and offer the transfer		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 2.126 % (b) After 2.126 %		
47			
17	Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		▼
a	0 (// /	└── Yes	X No
b	· · · · · · · · · · · · · · · · · · ·	Yes	X No
С		Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	Yes	X 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)	\$	
С		\$	
		\$ Yes	No
	Did the domestic corporation not recognize gain or loss on the distribution of property because the		☐ No
С	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)?		☐ No X No

# 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.

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION		Identifying numbe	er (see instructions)
<ul> <li>Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign co</li> <li>If the transferor was a corporation, complete questions 2a through 2d.</li> </ul>	orporation?	Yes	X No
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section	n 368(c)) by		
five or fewer domestic corporations?		Yes	No
<b>b</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	Ide	ntifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the part of not, list the name and employer identification number (EIN) of the parent corporation.	arent corporation?	Yes	□ No
Name of parent corporation	EIN of	parent corporati	on
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 treate complete questions 3a through 3d.	ed as such under section	on 367),	
a List the name and EIN of the transferor's partnership.			
Name of partnership	EIN	l of partnership	
THE TIFF KEYSTONE FUND, LP	76-08477	43	
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No
c Is the partner disposing of its entire interest in the partnership?		Yes	X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an es	stablished		
securities market?		Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)			
4 Name of transferee (foreign corporation)	5a	dentifying numb	er, if any
NEWGEN EQUITY LONG/SHORT FUND			
6 Address (including country) WINDWARD THREE, 4THFLOOR, WEST BAY RD	5b 1	Reference ID num	ber
GRAND CAYMAN KY1-1003 CAYMAN ISLANDS	FC	REIGNUS	
7 Country code of country of incorporation or organization CJ			
8 Foreign law characterization (see instructions) CAYMAN ISLANDS EXEMPTED COMPANY			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
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Type of property   Qale of property   Pate of prope	Part III Information	Regarding Trans	sfer of Property (see	instructions)		r ago <b>z</b>
property   Date of Description of Fair market value on Cost or other basis   STMT 28	Section A - Cash		<u> </u>			
10 Was cash the only property transferred?  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 Date of Description of Part III and go to Part IV.  Section B - Other Property (other than intangible property subject to section 367(d))  Type of Date of Description of Part III and go to Property Date of Property Date of Date of Description of Intender  10 Date of Property Date of Property Date of Property Date of	-	Date of	Description of	Fair market value on	Cost or other	Gain recognized on
Section B - Other Property (other than intangible property subject to section 367(d))  Type of Date of Description of property subject to section 367(d))  Type of Date of Description of property subject to section 367(d)  Stock and securities   Securit	Cash STMT 28					
Type of property Date of Description of Pair market value on date of transfer of Description of Pair market value on date of transfer of Dasis of Dasi	If "Yes," skip the rema	inder of Part III and g	o to Part IV.			X Yes No
Date of Description of property   Date of Description of property   Date of Description of Des	Section B - Other Pro					
Inventory    Inventory		Date of	Description of	Fair market value on	Cost or other	Gain recognized on
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?  12 Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  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?  If "Yes," continue to line 12b. If "No," skip line 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?  If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.  d Enter the transferor transfer property described in section 367(d)4?  Type of property  In the property subject to Section 367(d)  Type of Date of property described  Property described  In sec. 367(d)(4)	Stock and securities					
Property with   Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?   Yes	Inventory					
Totals  11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  13 by 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?  14 Yes No If 'Yes,' continue to line 12c. If 'No,' skip lines 12c and 12d, and go to line 13.  15 c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transfere foreign corporation?  15 Yes No If 'Yes, continue to line 12d. If 'No,' skip lines 12d, and go to line 13.  16 Enter the transferred loss amount included in gross income as required under section 91  S  17 yes No If 'No,' skip Section C and questions 14a through 15.  18 Did the transferor transfer property described in section 367(d)  19 Property Date of Description of property Infection of transfer Description of transfer Property Subject to Section 367(d)  19 Property described In sec. 387(d)(4)  20 Property described In sec. 387(d)(4)	Other property (not listed under another category)					
11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  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?  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 transfere foreign corporation?  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  Figure 13  Did the transferor transfer property described in section 367(d)4)?  Type of Calculate of Description of Property Subject to Section 367(d)  Property described in sec. 367(d)(4)	Property with built-in loss					
11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  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?  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 transfere foreign corporation?  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  Figure 13  Did the transferor transfer property described in section 367(d)4)?  Type of Calculate of Description of Property Subject to Section 367(d)  Property described in sec. 367(d)(4)	Totals					
Type of property  (a) Date of transfer  (b) Description of property  (c) Useful life  Arm's length price on date of transfer  (d) Arm's length price on date of transfer  (e) Cost or other basis  Income inclusion for year of transfer  Property described in sec. 367(d)(4)	foreign corporation?  If "Yes," go to line 12b  b Was the transferor a d (including a branch that If "Yes," continue to line c Immediately after the t transferee foreign corporate foreign corporate foreign corporate foreign corporate foreign corporate for transferor transfer	onestic corporation to tis a foreign disregate 12c. If "No," skip literansfer, was the domeoration?  The 12d. If "No," skip liters amount included sfer property describe	that transferred substantiall rded entity) to a specified 1 nes 12c and 12d, and go to estic corporation a U.S. should be substantially and go to line 13. in gross income as required at in section 367(d)(4)?	y all of the assets of a for 0%-owned foreign corpor o line 13. areholder with respect to	eign branch ration? [	Yes No
Type of property  (a) Date of transfer  (b) Description of property  (c) Useful life  Arm's length price on date of transfer  (d) Arm's length price on date of transfer  (e) Cost or other basis  Income inclusion for year of transfer  Property described in sec. 367(d)(4)	Section C - Intangible	Property Subje	ct to Section 367(d)			
in sec. 367(d)(4)	Type of	(a) Date of	(b) Description of	Useful Arm's length	price Cost or other	Income inclusion for
Totals	Property described in sec. 367(d)(4)					
Form <b>926</b> (Rev. 11-2018)	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
С	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 No
Sup	oplemental Part III Information Required To Be Reported (see instructions)		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
	rt IV Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before • 0 2 0 % (b) After • 2 5 6 %		
	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before020_ % (b) After0256_ %  Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351		
16 17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes	X No
16 17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before020_% (b) After256_%  Type of nonrecognition transaction (see instructions) > IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)		X No
16 17 18 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes	X No
16 17 18 a b	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes	X No
16 17 18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes	X No X No X No
16 17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes	X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No

# 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.

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION		Identifying numbe	er (see instructions)
<ul> <li>Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation.</li> <li>If the transferor was a corporation, complete questions 2a through 2d.</li> </ul>	oration?	Yes	X No
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 36	88(c)) by		
five or fewer domestic corporations?		Yes	No
b Did the transferor remain in existence after the transfer?		=	☐ No
If not, list the controlling shareholder(s) and their identifying number(s).			
Controlling shareholder	Ide	ntifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation.	t corporation?	Yes	No No
Name of parent corporation	EIN of	parent corporati	on
<ul> <li>d Have basis adjustments under section 367(a)(4) been made?</li> <li>3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated a complete questions 3a through 3d.</li> </ul>	s such under sectio	<b>Yes</b> on 367),	No No
a List the name and EIN of the transferor's partnership.			
Name of partnership	EIN	l of partnership	
THE TIFF KEYSTONE FUND, LP	76-08477		
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			X No
c Is the partner disposing of its entire interest in the partnership?		Yes	X No
<b>d</b> Is the partner disposing of an interest in a limited partnership that is regularly traded on an estab	lished		
securities market?		Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)			
4 Name of transferee (foreign corporation)	5a	dentifying numb	er, if any
NORTHWEST FEILONG FUND LTD			
6 Address (including country) P.O. BOX 309 UGLAND HOUSE	5b F	Reference ID num	ber
GRAND CAYMAN KY1-1104 CAYMAN ISLANDS	FO	REIGNUS	
7 Country code of country of incorporation or organization CJ			
8 Foreign law characterization (see instructions) CORPORATION			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.		Form <b>926</b> (I	Rev. 11-2018)

Part III Information Regarding Transfer of Property (see instructions)									
Section A - Cash									
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) arket value on e of transfer	<b>(d)</b> Cost or other basis	<b>(e)</b> Gain recognized on transfer			
Cash STMT 29									
10 Was cash the only pro If "Yes," skip the rema	inder of Part III and g					X Yes No			
Section B - Other Pro			subject			( )			
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) arket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer			
Stock and securities									
Inventory									
Other property (not listed under another category)									
Property with built-in loss									
Totals				<del></del>					
(including a branch that If "Yes," continue to linct Immediately after the transferee foreign corp. If "Yes," continue to linct Immediately after the transferred left.	oreign branch (included on the composition of the c	that transferred substantiall rded entity) to a specified 1 nes 12c and 12d, and go to lestic corporation a U.S. shall be substantially and go to line 13. in gross income as required in section 367(d)(4)?	n disregard y all of the 0%-owned o line 13. areholder w	ded entity) transferronders assets of a foreign foreign corporation with respect to the	ed to a	Yes       No         Yes       No         Yes       No         Yes       No			
Section C - Intangible	Property Subje	ct to Section 367(d)							
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer			
Property described in sec. 367(d)(4)									
Totals						Form <b>926</b> (Rev. 11-2018)			

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
	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
Sup	pplemental Part III Information Required To Be Reported (see instructions)		
Da	MA IV Additional Information Degarding Transfer of Dranauty (and instructions)		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
40			
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
	(a) Before% (b) After		
17	Type of nonrecognition transaction (see instructions) ► IRC SEC. 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		TT.
а	• • • • • • • • • • • • • • • • • • • •	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
<b>2</b> 0 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	Yes	X 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)	\$	
С			
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	
	DIODELLY Was used in the conduct of O.S. trade of business under negatiations section 1.50/16/21b/1219	i res	No
21		res	☐ 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  X No

124533 04-01-21

# 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.

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION	Identifying number (see instructions)		
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	tion? Yes X 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	b)) by		
five or fewer domestic corporations?			
<b>b</b> Did the transferor remain in existence after the transfer?			
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 c If not, list the name and employer identification number (EIN) of the parent corporation.	orporation? Yes No		
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 s complete guestions 3a through 3d.	uch under section 367),		
a List the name and EIN of the transferor's partnership.			
Name of partnership	EIN of partnership		
THE TIFF KEYSTONE FUND, LP	76-0847743		
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			
c Is the partner disposing of its entire interest in the partnership?			
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establish			
securities market?	Yes X No		
Part II Transferee Foreign Corporation Information (see instructions)			
4 Name of transferee (foreign corporation)	5a Identifying number, if any		
SINO VISION-GREATER CHINA MARKET NEUTRAL FUND			
6 Address (including country) 190 ELGIN AVENUE	<b>5b</b> Reference ID number		
GEORGE TOWN, GRAND CAYMAN KY1-9007 CAYMAN ISLANDS	FOREIGNUS		
7 Country code of country of incorporation or organization CJ			
8 Foreign law characterization (see instructions)			
CORPORATION  9 Is the transferor foreign corporation a controlled foreign corporation?	Yes X No		
9 Is the transferee foreign corporation a controlled foreign corporation?  124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.	Form <b>926</b> (Rev. 11-2018)		

Type of property  Cash STMT 30  Was cash the only property transferred?  If "ves," 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 araisfer  Type of property transferred?  Type of property (other than intangible property subject to section 367(d))  Type of property (other than intangible property subject to section 367(d))  Type of property (other than intangible property subject to section 367(d))  Type of property (other than intangible property subject to section 367(d))  Type of property (other than intangible property subject to section 367(d))  Type of property (other than intangible property subject to section 367(d))  Type of property (other than intangible property subject to section 367(d))  Type of property (other than intangible property subject to section 367(d))  Type of property (other than intangible property subject to section 367(d) with respect to which a gain recognized on gestification and the property with bulkin loss  Totals  Totals  Totals  Totals  Type of property with the property subject to section 367(d) with respect to which a gain recognized on gestification and the property subject to section 367(d) with respect to which a gain recognized on gestification and the property subject to section 367(d) with respect to which a gain recognized property as a foreign disregarded entity) to a specified 10%-covered foreign corporation?  Type of property with the transferred substantially all of the assets of a foreign branch foreign corporation?  Type of property with property subject to section 367(d) (d) (e) (e) (f) (f) (f) (f) (f) (f) (f) (f) (f) (f	Part III Information	Regarding Trans	sfer of Property (see	instructions)	<del></del>	r age <b>z</b>
property	Section A - Cash	(-)	(1.)	(-)	(.1)	1 (-)
10 Was cash the only property transferred?  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 Day Description of Part III and go to Part IV.  Section B - Other Property (other than intangible property subject to section 367(d))  Type of Day Description of Part III and go to Part IV.  Section B - Other Property (other than intangible property subject to section 367(d))  Type of Day Description of Part III and go to Part IV.  Section B - Other Property (other than intangible property subject to section 367(d))  Type of Day Description of Part III and go to Part IV.  Section B - Other Property (other than intangible property subject to section 367(a) and the part III and the part III and the part III and the part III and III	-	Date of	Description of	Fair market value	on Cost or other	Gain recognized on
Section B - Other Property (other than intangible property subject to section 367(d))  Type of Date of Date of Description of Fair market value on Cost or other Dessis Stock and securities   Date of Date of Property   Date of Description of Fair market value on Cost or other Dessis	Cash STMT 30					
Type of property Date of	If "Yes," skip the rema	inder of Part III and g	o to Part IV.			X Yes No
Stock and securities   Date of property   Date of property   Part of property   Date of Description of property   Date of property   Date of Description of Description   Date of Description of Description of Description   Date of Description of Description of Description   Date of Description of Description   Date of Description of Description of Description   Date of Description	Section B - Other Pro	· · · · · ·				1
Inventory    Inventory		Date of	Description of	Fair market value	on Cost or other	Gain recognized on
Other property (not listed under another category)  Property with built-in loss  11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  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?  If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.  c Immediately after the transfere, was the domestic corporation a U.S. shareholder with respect to the transferce foreign corporation?  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  Section C - Intangible Property Subject to Section 367(d):  Type of Date of Description of Property  If "No," skip Section C and questions 14a through 15.  Section C - Intangible Property Subject to Section 367(d)  Type of Date of Date of Description of Iransfer was foreign and through 15.  Section C - Intangible Property Subject to Section 367(d)  Type of Date of Date of Date of Description of Iransfer was ferror basis in come inclusion for year of transfer basis.  Property described in section 367(d)  Totals	Stock and securities					
(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?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  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) transferred to a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign branch (including a branch that is a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign branch (including a branch that is a foreign disregarded entity) transferre	Inventory					
Totals  11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was flied?  12 Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  12 "Yes," go to line 12b.  13 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?  14 "Yes," continue to line 12b. If "No," skip lines 12c and 12d, and go to line 13.  15 Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transfere foreign corporation?  16 "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.  27 If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.  38 Id Enter the transferred loss amount included in gross income as required under section 91  19 S  10 Id the transferor transfer property described in section 367(d)(4)?  10 If "No," skip Section C and questions 14a through 15.  11 Section C - Intangible Property Subject to Section 367(d)  12 Property described in section 367(d)(4)?  13 Did the transferor transfer property Subject to Section 367(d)  14 Property described in section 367(d)(4)?  15 Property described in section 367(d)(4)?  16 Property described in section 367(d)(4)?	Other property (not listed under another category)					
11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  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?  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?  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  Section C - Intangible Property Subject to Section 367(d)  Type of (a) (b) (c) Useful Arm's length price on date of transfer  Property described in section 50 (Juseful Arm's length price on date of transfer  Property described in section 67 (d)  Totals	Property with built-in loss					
11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  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?  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?  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  Section C - Intangible Property Subject to Section 367(d)  Type of (a) (b) (c) Useful Arm's length price on date of transfer  Property described in section 50 (Juseful Arm's length price on date of transfer  Property described in section 67 (d)  Totals	Totals					
Type of property  (a) Date of transfer  Description of property  Description of property  Property described in sec. 367(d)(4)  Totals  (b) Description of Description of property  Description of property  Description of Description of property  Description of property  Description of property  Description of Description of property  Income inclusion for year of transfer  Description of Description of Description of Arm's length price on date of transfer  Description of Description	foreign corporation?  If "Yes," go to line 12b  b Was the transferor a d (including a branch that If "Yes," continue to line c Immediately after the t transferee foreign corporate foreign corporate foreign corporate foreign corporate foreign corporate for transferor transfer	onestic corporation to at is a foreign disregal the 12c. If "No," skip literansfer, was the domoration?  The 12d. If "No," skip liters amount included sfer property describes.	that transferred substantiall rded entity) to a specified 1 nes 12c and 12d, and go to estic corporation a U.S. should be substantially and go to line 13. in gross income as required at in section 367(d)(4)?	y all of the assets of a 0%-owned foreign corp o line 13. areholder with respect	foreign branch poration?	Yes No
Type of property  (a) Date of transfer  Description of property  Description of property  Property described in sec. 367(d)(4)  Totals  (b) Description of Description of property  Description of property  Description of Description of property  Description of property  Description of property  Description of Description of property  Income inclusion for year of transfer  Description of Description of Description of Arm's length price on date of transfer  Description of Description	Section C - Intangible	Property Subje	ct to Section 367(d)			
Totals	Type of	(a) Date of	(b) Description of	Useful Arm's leng	th price   Cost or other	Income inclusion for
	Property described in sec. 367(d)(4)					
	Totals					Form <b>926</b> (Rev. 11-2018)

b c d 19 20 a b c	Gain recognition under section 904(f)(3)	Yes Yes Yes Yes Yes Yes Yes Yes Yes	X No
b c d 19 20 a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) If "Yes," complete lines 20b and 20c. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) 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)? Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No X No No
b c d 19 20 a b c	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) If "Yes," complete lines 20b and 20c. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) 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 Yes Yes Yes Yes Yes Yes	X No X No X No X No X No X No
b c d 19 20 a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) If "Yes," complete lines 20b and 20c. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) Did the domestic corporation not recognize gain or loss on the distribution of property because the	Yes Yes Yes Yes Yes Yes	X No X No X No X No X No X No
b c d 19 20 a	Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  If "Yes," complete lines 20b and 20c.	Yes Yes Yes Yes Yes Yes	X No X No X No X No
b c d 19 20 a	Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  If "Yes," complete lines 20b and 20c.	Yes Yes Yes Yes	X No X No X No X No
b c d 19	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification?	Yes Yes Yes Yes	X No X No X No X No
b c d	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987	Yes Yes Yes	X No X No X No X No
b c	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d)	Yes Yes	X No X No X No
b	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
_	Gain recognition under section 904(f)(3)		X No
-	Gain recognition under section 904(f)(3)	Yes	
а	indicate whether any transfer reported in Part in is subject to any or the following.		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
17	Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351		
	(a) Before % (b) After144 %		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
	(assimonation)		
Pai	rt IV Additional Information Regarding Transfer of Property (see instructions)		
oup	pplemental Part III Information Required To Be Reported (see instructions)		
O	aniomental Port III Information Degrined To Be Deported (see test settles)		
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	No
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any		
	Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$		
	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in		
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable		
	1.367(d)-1(c)(3)(ii) for any intangible property?	Yes	No
_	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section		
C	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?	Yes	No
	reasonably anticipated to exceed 20 years?	Yes	No
	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life		
b			

## 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.

OMB	No.	1545-0026

Attachment Sequence No. **128** 

Par	t I U.S. Transferor Information (see instructions)			
Name	e of transferor		Identifying numb	er (see instructions)
	LLIAMSBURG COMMUNITY HEALTH FOUNDATION			(000
_		:0		X No
1	Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation.	ion?	Yes	A NO
2	If the transferor was a corporation, complete questions 2a through 2d.			
а	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	ld	entifying number	
С	If the transferor was a member of an affiliated group filing a consolidated return, was it the parent co	orporation?	Yes	L No
	If not, list the name and employer identification number (EIN) of the parent corporation.			
	Name of parent corporation	EIN o	f parent corporat	ion
	Name of parent corporation	LING	n parent corporat	ion .
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 su	ich under seet	ion 367)	
3		acii uiluei seci	1011 307),	
	complete questions 3a through 3d.			
а	List the name and EIN of the transferor's partnership.			
	Name of partnership	E	IN of partnership	
	The state of the s		pa a	
_TF	HE TIFF KEYSTONE FUND, LP	76-08 <b>4</b> 7	743	
b	Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No
	Is the partner disposing of its <b>entire</b> interest in the partnership?			X No
	Is the partner disposing of an interest in a limited partnership that is regularly traded on an establish			
-			Yes	X No
Par			103	140
		I		
4	Name of transferee (foreign corporation)	5a	Identifying numb	er, if any
~-				
	ONEHILL OFFSHORE PARTNERS LIMITED			
6	Address (including country)	5b	Reference ID num	ber
89	NEXUS WAY, CAMANA BAY			
	AND CAYMAN KY1-1205 CAYMAN ISLANDS	F	OREIGNUS	
7	Country code of country of incorporation or organization			
C				
8	Foreign law characterization (see instructions)			
	AYMAN ISLANDS EXEMPTED COMPANY			77
9	Is the transferee foreign corporation a controlled foreign corporation?	<u></u>	Yes	X No

Form 926 (Rev. 11-2018)

	Regarding Trans	sfer of Property (see	instructio	ns)		м
Section A - Cash						
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) orket value on of transfer	<b>(d)</b> Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash	12/31/2021	• • •	1,8	323,664.		
10 Was cash the only pro If "Yes," skip the rema	inder of Part III and g					X Yes No
Section B - Other Pro	(a) Date of	(b)  Description of		(c) arket value on	(d) Cost or other	(e) Gain recognized on
property	transfer	property	date	of transfer	basis	transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
If "Yes," go to line 12b  b Was the transferor a d (including a branch that If "Yes," continue to ling c Immediately after the t transferee foreign corp If "Yes," continue to ling d Enter the transferred to	oreign branch (including the composition of the com	hat transferred substantiall rded entity) to a specified 1 nes 12c and 12d, and go to estic corporation a U.S. shame 12d, and go to line 13. In gross income as required at in section 367(d)(4)?	n disregard y all of the a 0%-owned f o line 13. areholder wi	ed entity) transferre	oranch	Yes         No           Yes         No           Yes         No           Yes         No
Section C - Intangible	Property Subje	ct to Section 367(d)				
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		<b>(d)</b> 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						Form <b>926</b> (Rev. 11-2018)

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
С	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 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
Sup	pplemental Part III Information Required To Be Reported (see instructions)		
Pa	rt 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 .197 % (b) After .197 %		
17	Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.	_	
а	Gain recognition under section 904(f)(3)	Yes	X No
b			X No
С			X No
d	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X No
	If "Yes," complete lines 20b and 20c.		
b		<b>&gt;</b> \$	
c			
•			
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	No
21	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	Yes	☐ No
21	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  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 X No

124533 04-01-21

# 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.

OMB No. 1545-0026

Attachment Sequence No. **128** 

Part I U.S. Transferor Information (see instructions)			
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION		Identifying number	er (see instructions)
<ul> <li>Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corpo</li> <li>If the transferor was a corporation, complete questions 2a through 2d.</li> <li>If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 36)</li> </ul>		Yes	X No
		Yes	No
·			=
b Did the transferor remain in existence after the transfer?		L Yes	No
If not, list the controlling shareholder(s) and their identifying number(s).			
Controlling shareholder	Idei	ntifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation.	t corporation?	Yes	□ No
Name of parent corporation	EIN of	parent corporati	on
d Have basis adjustments under section 367(a)(4) been made?		Yes	No No
<b>3</b> If the transferor was a partner in a partnership that was the actual transferor (but is not treated as complete questions 3a through 3d.	s such under sectio	n 367),	
a List the name and EIN of the transferor's partnership.			
Name of partnership	EIN	l of partnership	
THE TIFF KEYSTONE FUND, LP	76-08477	43	
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No
c Is the partner disposing of its entire interest in the partnership?		Yes	X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estable			
securities market?		Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)			140
4 Name of transferee (foreign corporation)	5a I	dentifying numb	er, if any
VOLORIDGE TRADING AGGRESSIVE FUND, LTD.			
6 Address (including country) 94 SOLARIS AVENUE, CAMANA BAY, PO BOX 1348  CRAND CANADA KY1 1100 CAMANA TGLANDS		Reference ID num	ber
GRAND CAYMAN KY1-1108 CAYMAN ISLANDS	FO	REIGNUS	
7 Country code of country of incorporation or organization  CJ			
8 Foreign law characterization (see instructions) CAYMAN ISLANDS EXEMPTED COMPANY			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.		Form <b>926</b> (l	Rev. 11-2018)

Section A - Cash						
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	<b>(d)</b> Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash STMT 31						
10 Was cash the only pro If "Yes," skip the rema	ainder of Part III and g					X Yes No
Section B - Other Pro			subject			()
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	<b>(d)</b> Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
(including a branch that If "Yes," continue to linct Immediately after the transferee foreign corp. If "Yes," continue to linct Immediately after the transferred left.	foreign branch (included included inclu	that transferred substantiall rded entity) to a specified 1 ines 12c and 12d, and go to lestic corporation a U.S. shadine 12d, and go to line 13. in gross income as required ed in section 367(d)(4)?	n disregard y all of the 0%-owned o line 13. areholder v	assets of a foreign foreign corporation with respect to the	red to a  branch  n?	Yes       No         Yes       No         Yes       No         Yes       No
Section C - Intangible	Property Subje	ct 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 transfe		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						Form <b>926</b> (Rev. 11-2018)

b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes Yes	X No
17 18 a b c d 19 20 a b	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes	X No X No X No X No X No X No No
17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No X No
17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No
17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No
17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes	X No X No X No X No
17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes	X No X No X No X No
17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes	X No X No X No X No
17 18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes	X No X No X No
17 18 a b	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes	X No
17 18 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before		X No
17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	 	
17	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before		
	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before $\underline{004}$ % (b) After $\underline{341}$ %		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before $\underline{004}$ % (b) After $\underline{341}$ %		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
Pai	rt IV Additional Information Regarding Transfer of Property (see instructions)		
	1 (000 1101 10010)		
Sup	oplemental Part III Information Required To Be Reported (see instructions)		
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Tes	NO
IJ		Yes	No
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any		
	Regulations section 1.367(d)-1(c)(3)(ii) \$		
	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in		
u	1.367(d)-1(c)(3)(ii) for any intangible property?  If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable	tes	NO
d	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Yes	No
			∟ No
С	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?		
С	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?		=
b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?		☐ No

## 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.

OMB No. 1545-0026

Attachment Sequence No. **128** 

Par	rt I U.S. Transferor Information (see instructions)			
Name	e of transferor		Identifying number	er (see instructions)
W]	ILLIAMSBURG COMMUNITY HEALTH FOUNDATION			,
1	Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?		Yes	X No
2	If the transferor was a corporation, complete questions 2a through 2d.			
	If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by			
а			Yes	No
	five or fewer domestic corporations?		=	=
D	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	lde	ntifying number	
	<u> </u>			
С	If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporate	ation?	Yes	No
	If not, list the name and employer identification number (EIN) of the parent corporation.			
	Name of parent corporation	EIN of	parent corporati	
	Name of parent corporation	LIN OI	parent corporati	OII
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 un	nder sectio	on 367),	
	complete questions 3a through 3d.			
а	List the name and EIN of the transferor's partnership.			
	Name of partnership	EIN	N of partnership	
ΤF	HE TIFF KEYSTONE FUND, LP 76-	08477	43	
b	Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No
	Is the partner disposing of its entire interest in the partnership?			X No
u			Yes	X No
Par	securities market?  rt II Transferee Foreign Corporation Information (see instructions)		163	I40
4	Name of transferee (foreign corporation)	50	Identifying numb	or if any
7	Name of transferee (foreign corporation)	Ja	identifying numb	er, ii ariy
WC	ORLD CARBON FUND			
			Defense a ID mone	la a
6 2 NTT	Address (including country) D FLOOR, BLOCK E IVEAGH COURT, HARCOURT ROAD	30	Reference ID num	ber
		F-C	DETCNIIC	
	BLIN IRELAND	FC	REIGNUS	
7	Country code of country of incorporation or organization			
_E]				
8	Foreign law characterization (see instructions)			
	DRPORATION			
9	Is the transferee foreign corporation a controlled foreign corporation?	<u></u>	Yes	X No

124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.

Form 926 (Rev. 11-2018)

Part III Information	Regarding Trans	sfer of Property (see	instructions)		r ugo <u>z</u>
Section A - Cash  Type of	_ (a)	(b) Description of	(c) Fair market value on	(d)	(e)
property	Date of transfer	Description of property	date of transfer	Cost or other basis	Gain recognized on transfer
Cash	11/02/2021		531,513.		
10 Was cash the only pro- If "Yes," skip the rema	ainder of Part III and go				X Yes No
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		p p = y			
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					
(including a branch that If "Yes," continue to lince Immediately after the stransferee foreign corp. If "Yes," continue to lince Immediately after the transferred left.  13 Did the transferor trans. If "No," skip Section Communication.	foreign branch (including to the composition of the	hat transferred substantially ded entity) to a specified 10 nes 12c and 12d, and go to estic corporation a U.S. shame 12d, and go to line 13. In gross income as required in section 367(d)(4)?	n disregarded entity) trans y all of the assets of a fore 0%-owned foreign corpora line 13. areholder with respect to the	ferred to a  ign branch tion?	Yes No Yes No Yes No Yes No Yes No Yes No
Section C - Intangible	Property Subject	ct to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's length p on date of tran	rice Cost or other sfer basis	(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)					
Totals					Form <b>926</b> /Poy 11 2019\

ı <del>4</del> d	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?		☐ No
С	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
Sup	plemental Part III Information Required To Be Reported (see instructions)		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
Pa 16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before		
16 17	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before		
16 17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before688_ % (b) After688_ %  Type of nonrecognition transaction (see instructions) > IRC SEC. 351  Indicate whether any transfer reported in Part III is subject to any of the following.		₩
16 17 18 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before		X No
16 17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes	X No
16 17 18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes	X No
16 17 18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes	X No X No X No
16 17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes	X No X No X No X No
16 17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes	X No X No X No
16 17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No
116 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No
116 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No
116 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No

124533 04-01-21

# 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.

OMB No. 1545-0026

Attachment Sequence No. **128** 

Part I U.S. Transferor Information (see instructions)			
Name of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION		Identifying numbe	er (see instructions)
<ul> <li>1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation.</li> <li>2 If the transferor was a corporation, complete questions 2a through 2d.</li> </ul>	oration?	Yes	X No
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 36	88(c)) by		
five or fewer domestic corporations?		Yes	☐ No
<b>b</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	Ide	ntifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation.	t corporation?	Yes	└ No
Name of parent corporation	EIN of	parent corporati	on
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 a complete questions 3a through 3d.	s such under sectio	on 367),	
a List the name and EIN of the transferor's partnership.			
Name of partnership	EIN	l of partnership	
THE TIFF CENTERSTONE FUND, LP	82-09206		
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			X No
c Is the partner disposing of its entire interest in the partnership?		Yes	X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estab	lished	<b>,</b>	▼
Part II Transferee Foreign Corporation Information (see instructions)		Yes	X No
4 Name of transferee (foreign corporation)	5a I	dentifying numb	er, if any
KOPERNIK GLOBAL ALL-CAP OFFSHORE FUND LTD			
6 Address (including country) 190 ELGIN AVENUE	5b F	Reference ID num	ber
GEORGE TOWN, GRAND CAYMAN KY1-9001 CAYMAN ISLANDS	FO	REIGNUS	
7 Country code of country of incorporation or organization CJ			
8 Foreign law characterization (see instructions) CORPORATION			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.		Form <b>926</b> (I	Rev. 11-2018)

Part III Information	Regarding Trans	sfer of Property (see	instructions)		
Section A - Cash  Type of	_ (a)	(b) Description of	(c) Fair market value on	(d)	(e)
property	Date of transfer	Description of property	date of transfer	Cost or other basis	Gain recognized on transfer
Cash	01/02/2021		102,918.		
10 Was cash the only pro- If "Yes," skip the rema	ainder of Part III and go				X Yes No
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		p p y			
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					
(including a branch that If "Yes," continue to lince Immediately after the stransferee foreign corp. If "Yes," continue to lince Immediately after the transferred left.  13 Did the transferor trans. If "No," skip Section Communication.	foreign branch (including).  Idomestic corporation that is a foreign disregarene 12c. If "No," skip limit transfer, was the domination?  The 12d. If "No," skip limit included in the second included included in the second included included in the second included inclu	hat transferred substantially ded entity) to a specified 10 nes 12c and 12d, and go to estic corporation a U.S. shame 12d, and go to line 13. In gross income as required in section 367(d)(4)?	n disregarded entity) transion disregarded entity) transion of the assets of a foreign corporate line 13.  Areholder with respect to the discrete of the second of the sec	ferred to a  gn branch tion?  ne	Yes No Yes No Yes No Yes No Yes No
Section C - Intangible	Property Subject	ct to Section 367(d)			
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property	(c) (d) Useful Arm's length pi	rice Cost or other sfer basis	Income inclusion for year of transfer
Property described in sec. 367(d)(4)					
Totals					Form <b>026</b> (Day 11 2019)

b At the til c Did the til 1.367(d) d If the an to the in Regulati 15 Was any time the  Supplemen  Part IV A  16 Enter the (a) Before the second term of the tile of tile of the tile of tile of tile of the tile of t	bly anticipated to exceed 20 years?  me of the transfer, did any of the transferred intangible property have an indefinite useful life?  transferor choose to apply the 20-year inclusion period provided under Regulations section  -1(c)(3)(ii) for any intangible property?  swer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable tangible property's, or properties', as applicable, use(s) beyond the 20-year period described in ons section 1.367(d)-1(c)(3)(ii)   \$\infty\$ \$\	Yes Yes Yes	No No No
c Did the final state of the interest of the i	transferor choose to apply the 20-year inclusion period provided under Regulations section -1(c)(3)(ii) for any intangible property?  swer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable tangible property's, or properties', as applicable, use(s) beyond the 20-year period described in ons section 1.367(d)-1(c)(3)(ii)    **The section of the transfer or at any reafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	□ No
1.367(d) d If the an to the in Regulati 15 Was any time the  Supplemer  Part IV A  16 Enter th. (a) Befo	swer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable tangible property's, or properties', as applicable, use(s) beyond the 20-year period described in ons section 1.367(d)-1(c)(3)(ii)   \$\Bigsim \sum_{\text{intangible}} \square_{\text{intangible}}  intangible property transferred considered or anticipated to be, at the time of the transfer or at any reafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?		
d If the an to the in Regulati 15 Was any time the  Supplemer  Part IV A  16 Enter th.  (a) Befo	swer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable tangible property's, or properties', as applicable, use(s) beyond the 20-year period described in ons section 1.367(d)-1(c)(3)(ii)   \$\insigm\\$ \$\		
to the in Regulati 15 Was any time the Supplemer  Part IV A  16 Enter the (a) Before the Regulation of	tangible property's, or properties', as applicable, use(s) beyond the 20-year period described in ons section 1.367(d)-1(c)(3)(ii)   \$\infty\$ \$\\$  intangible property transferred considered or anticipated to be, at the time of the transfer or at any reafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	□ No
Regulati 15 Was any time the  Supplement  Part IV A  16 Enter the (a) Before	ons section 1.367(d)-1(c)(3)(ii)  \$\ \sim \\$ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Yes	□ No
Supplemer  Part IV A  16 Enter th.  (a) Before	rintangible property transferred considered or anticipated to be, at the time of the transfer or at any reafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	□ No
Part IV A  16 Enter th. (a) Before	reafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	□ No
Part IV A  16 Enter th.  (a) Befo		Yes	No No
Part IV A  16 Enter th  (a) Befo	ntal Part III Information Required To Be Reported (see instructions)		
16 Enter the			
(a) Befo	dditional Information Regarding Transfer of Property (see instructions)		
	e transferor's interest in the transferee foreign corporation before and after the transfer. ore $1.229~\%$ (b) After $1.269~\%$		
<b>17</b> Type of	nonrecognition transaction (see instructions) ► IRC SEC. 351		
	whether any transfer reported in Part III is subject to any of the following.		
	cognition under section 904(f)(3)	Yes	X No
	cognition under section 904(f)(5)(F)	Yes	X No
		Yes	X No
	re under section 1503(d)	Yes	X No
	ge gain under section 987 transfer result from a change in entity classification?	Yes	X No
	•	Yes	X No
	mestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	res	
•	complete lines 20b and 20c.		
	e total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)		
	domestic corporation not recognize gain or loss on the distribution of property because the		
	1. 11 1. (110.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1	Yes	No
	was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	<b>v</b>
covered	was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  mestic corporation make a section 355 distribution of stock in a foreign controlled corporation  by section 367(e)(1)? See instructions		LX∐ No

124533 04-01-21

# 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.

OMB No. 15	45-0026
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Attachment Sequence No. **128** 

Part I U.S. Transferor Information (see instructions)			
lame of transferor WILLIAMSBURG COMMUNITY HEALTH FOUNDATION			er (see instructions)
WITHITAMODONG COMMONITY HEADIN FOUNDATION			
Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corpor	ration?	Yes	X No
2 If the transferor was a corporation, complete questions 2a through 2d.			
<b>a</b> If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368)	3(c)) by		
five or fewer domestic corporations?		Yes	No
<b>b</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	Ide	entifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation.	corporation?	Yes	∟ No
Name of parent corporation	EIN of	parent corporati	on
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	on 367),	
complete questions 3a through 3d.			
a List the name and EIN of the transferor's partnership.			
Name of partnership	EII	N of partnership	
THE TIFF CENTERSTONE FUND, LP	82-09206	506	
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			X No
c Is the partner disposing of its entire interest in the partnership?			X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estable		1es	110
securities market?		Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)		103	140
4 Name of transferee (foreign corporation)	5a	Identifying numb	er, if any
NEO IVY CAPITAL OFFSHORE LTD		Defense ID some	In
6 Address (including country) 27 HOSPITAL ROAD	50	Reference ID num	iber
GEORGE TOWN, GRAND CAYMAN KY1-9008 CAYMAN ISLANDS	) <del>T</del>	OREIGNUS	
7 Country code of country of incorporation or organization	1 - 0		
CJ			
8 Foreign law characterization (see instructions)			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
124531 04-01-21 LHA For Paperwork Reduction Act Notice, see separate instructions.			Rev. 11-2018)

Part III Information	Regarding Trans	fer of Property (see	instructio	ns)		1 ago <u>2</u>
Section A - Cash Type of	(a)	(b)		(c)	(d)	(e)
property	Date of transfer	<b>(b)</b> Description of property		rket value on of transfer	Cost or other basis	Gain recògnized on transfer
Cash	08/01/2020			84,371.		
	ainder of Part III and go					X Yes No
Section B - Other Pro	<u> </u>		subject t			(a)
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) rket value on of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and	114110101	рторого		51 114110101		W. C. F.
securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
(including a branch the lif "Yes," continue to learn the transferee foreign configures," continue to learn the transferred to learn the transferred light the transferor transfer light "No," skip Section (including light).	foreign branch (includir b. domestic corporation that is a foreign disregard line 12c. If "No," skip lin transfer, was the dome rporation? line 12d. If "No," skip lin loss amount included ir nsfer property described C and questions 14a the	nat transferred substantiall ded entity) to a specified 1 es 12c and 12d, and go to estic corporation a U.S. shall be 12d, and go to line 13. In gross income as required d in section 367(d)(4)?	yn disregarde y all of the a 0%-owned fo o line 13. areholder wi	ed entity) transferred ssets of a foreign b oreign corporation? th respect to the	d to a	YesNo
Section C - Intangible	e Property Subjec	t to Section 367(d)	<u> </u>			
Type of property	(a) Date of transfer	(b) Description of property		(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						
TOTALS					F	

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
	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) \$\rightarrow\$		
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
Sup	plemental Part III Information Required To Be Reported (see instructions)		
Par	t 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 • 136 % (b) After • 197 %		
17	Type of nonrecognition transaction (see instructions) ► IRC SEC. 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	Yes	X 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)	<b>\$</b>	
	Enter the total amount of gain of 1000 1000qm200 parouant to Hogalations soution 1.001(0) 2(0)	Ψ	
•			
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the	Ves	
	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
c 21	Did the domestic corporation not recognize gain or loss on the distribution of property because the	Yes Yes	☐ No  X No

FORM 926	PART III - INFORMATION REGARDING TRANSFER OF PROPERTY	STATEMENT 28
	CASH	
(A) DATE OF TRANSFER	(C) FAIR MARKET VALUE ON DATE OF TRANSFER	
01/02/2021 02/01/2020	875,433. 61,587.	
	937,020.	

FORM 926	PART III - INFORMATION REGARDING TRANSFER OF PROPERTY	STATEMENT 29
	CASH	
(A) DATE OF TRANSFER	(C) FAIR MARKET VALUE ON DATE OF TRANSFER	
06/02/2021 04/02/2020	1,250,619. 97,974.	
	1,348,593.	

FORM 926	PART III - INFORMATION REGARDING TRANSFER OF PROPERTY	STATEMENT 30
	CASH	
(A) DATE OF TRANSFER	(C) FAIR MARKET VALUE ON DATE OF TRANSFER	
12/02/2021 05/02/2020	1,094,291.	
	1,167,771.	

FORM 926	PART III - INFORMATION REGARDING TRANSFER OF PROPERTY	STATEMENT 31
	CASH	
(A) DATE OF TRANSFER	(C) FAIR MARKET VALUE ON DATE OF TRANSFER	
01/01/2021 01/01/2021	133,094. 907,295.	
	1,040,389.	