Form **990**

Department of the Treasury

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

Do not enter social security numbers on this form as it may be made public.
 Go to www.irs.gov/Form990 for instructions and the latest information.

2019
Open to Public Inspection

For the 2019 calendar year, or tax year beginning , and ending D Employer identification number C Name of organization Henry County Community Foundation, Check if applicable: Address change Doing business as 31-1170412 Name change Number and street (or P.O. box if mail is not delivered to street address) 765-529-2235 Initial return PO Box 6006 Final return/ City or town, state or province, country, and ZIP or foreign postal code terminated New Castle IN 47362-6006 18,183,118 **G** Gross receipts\$ Amended return Name and address of principal officer: Yes **H(a)** Is this a group return for subordinates Application pending Beverly Matthews PO Box 6006 H(b) Are all subordinates included? If "No," attach a list. (see instructions) New Castle IN 47362 **X** 501(c)(3) 501(c) () (insert no.) 527 Tax-exempt status: www.henrycountycf.org Website: **H(c)** Group exemption number ▶ Year of formation: 1985 Form of organization: | X | Corporation | Trust M State of legal domicile: Part I Summarv 1 Briefly describe the organization's mission or most significant activities: Activities & Governance See Schedule O 2 Check this box ▶ if the organization discontinued its operations or disposed of more than 25% of its net assets. 3 Number of voting members of the governing body (Part VI, line 1a) 17 4 Number of independent voting members of the governing body (Part VI, line 1b) 16 5 Total number of individuals employed in calendar year 2019 (Part V, line 2a) 7 5 6 Total number of volunteers (estimate if necessary) 6 80 7a Total unrelated business revenue from Part VIII, column (C), line 12 -12,209 **b** Net unrelated business taxable income from Form 990-T, line 39 Prior Year Current Year 3,782,663 3,007,406 8 Contributions and grants (Part VIII, line 1h) 9 Program service revenue (Part VIII, line 2g) 416,403 443,586 10 Investment income (Part VIII, column (A), lines 3, 4, and 7d) 1,620,227 1,013,379 -13,402-16,997 **11** Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e) 5,805,891 4,447,374 12 Total revenue – add lines 8 through 11 (must equal Part VIII, column (A), line 12) 1,570,349 13 Grants and similar amounts paid (Part IX, column (A), lines 1–3) 1,468,516 **14** Benefits paid to or for members (Part IX, column (A), line 4) 15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5–10) 223,713 226,577 16aProfessional fundraising fees (Part IX, column (A), line 11e) **b** Total fundraising expenses (Part IX, column (D), line 25) 17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e) 1,310,100 915,911 3,002,329 18 Total expenses. Add lines 13–17 (must equal Part IX, column (A), line 25) 2,712,837 2,803,562 1,734,537 **19** Revenue less expenses. Subtract line 18 from line 12 **Beginning of Current Year** End of Year 38,753,482 45,442,959 20 Total assets (Part X, line 16) 1,127,204 955,407 **21** Total liabilities (Part X, line 26) 22 Net assets or fund balances. Subtract line 21 from line 20 37,626,278 ,487,552 Signature Block Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge. Signature of officer Sign **Executive Director** Here Beverly Matthews Type or print name and title Print/Type preparer's name Preparer's signature Check Paid Thomas A. Roberts Thomas A. Roberts 04/22/24 self-employed P00997867 **Preparer** Estep Burkey 04-3587095 Simmons, Firm's EIN ▶ Firm's name **Use Only** PO Box 42 Muncie, IN 47308-0042 765-284-7554 May the IRS discuss this return with the preparer shown above? (see instructions) X Yes No

	ation, 31-11/0412	Page Z
Part III Statement of Program Service Accomplishme Check if Schedule O contains a response or not		X
Briefly describe the organization's mission:	e to any line in this Part in	
Soo Sahodulo O		
— 		
		_
2 Did the organization undertake any significant program services durin		
prior Form 990 or 990-EZ?		Yes X No
If "Yes," describe these new services on Schedule O. 3 Did the organization cease conducting, or make significant changes in	how it conducts, any program	
		Yes X No
services? If "Yes," describe these changes on Schedule O.		100 110
4 Describe the organization's program service accomplishments for each	ch of its three largest program services, as measured by	
expenses. Section 501(c)(3) and 501(c)(4) organizations are required	to report the amount of grants and allocations to others	,
the total expenses, and revenue, if any, for each program service repo	orted.	
4a (Code:) (Expenses \$ 531,163 including gr	rants of\$ 484,866) (Revenue \$	126 062
Education and Scholarship - Scholar to high school seniors and college been established to aid students fi education. Other educational grants for educational programming.	students through endowment v nancially in their pursuit	which have of higher s to schools
*		
4b (Code:) (Expenses \$ 941,728 including grading of Civic - Grants awarded to the Cadiz Department for equipment upgrades, Bridge project, New Castle Public L New Castle Main Street. Other civic nonprofits including the Henry Coun Bank of East Central Indiana, New C Foundation and Salvation Army.	Middletown Park Board for H ibrary for assisted listeni grants include designated ty Humane Society, Second H	r Fire oneycreek ng system ar payments to arvest Food
4c (Code:)(Expenses	nizations for local trail a eries, Guyer Opera House fo ts to the local Henry Count	nd park r handicap y YMCA, Art
4d Other program services (Describe on Schedule O.) (Expenses \$ 184,672 including grants of\$ 4e Total program service expenses ▶ 1,720,292	168,576) (Revenue \$ 47,619)

Form 990 (2019) Henry County Community Foundation, 31-1170412 Part IV Checklist of Required Schedules

			Yes	No
1	Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes,"			
_	complete Schedule A	1	X	
2	Is the organization required to complete <i>Schedule B, Schedule of Contributors</i> (see instructions)?	2	Х	
3	Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I	,		х
4	Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h)	3		Λ
4	election in effect during the tax year? If "Yes," complete Schedule C, Part II	4		х
5	Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues,	-		21
J	assessments, or similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III	5		х
6	Did the organization maintain any donor advised funds or any similar funds or accounts for which donors			
	have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If			
	"Yes," complete Schedule D, Part I	6	Х	
7	Did the organization receive or hold a conservation easement, including easements to preserve open space,			
	the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II	7		X
8	Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes,"			
	complete Schedule D, Part III	8		X
9	Did the organization report an amount in Part X, line 21, for escrow or custodial account liability, serve as a			
	custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or			
	debt negotiation services? If "Yes," complete Schedule D, Part IV	9		X
10	Did the organization, directly or through a related organization, hold assets in donor-restricted endowments			
	or in quasi endowments? If "Yes," complete Schedule D, Part V	10	X	
11	If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI,			
	VII, VIII, IX, or X as applicable.			
а	Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes,"			
	complete Schedule D, Part VI	11a	Х	
b	Did the organization report an amount for investments—other securities in Part X, line 12, that is 5% or more	441		37
_	of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII	11b		Х
С	Did the organization report an amount for investments—program related in Part X, line 13, that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII	11c		х
d	Did the organization report an amount for other assets in Part X, line 15, that is 5% or more of its total assets	110		Λ
u	reported in Part X, line 16? If "Yes," complete Schedule D, Part IX	11d		х
е	Did the organization report an amount for other liabilities in Part X, line 25? <i>If</i> "Yes," <i>complete Schedule D, Part X</i>	11e	X	
f	Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses	1.0		
-	the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X	11f	X	
12a	Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete			
	Schedule D, Parts XI and XII	12a	X	
b	Was the organization included in consolidated, independent audited financial statements for the tax year? If			
	"Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional	12b		X
13	Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	13		X
14a	Did the organization maintain an office, employees, or agents outside of the United States?	14a		X
b	Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking,			
	fundraising, business, investment, and program service activities outside the United States, or aggregate			
	foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV	14b		Х
15	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or			
	for any foreign organization? If "Yes," complete Schedule F, Parts II and IV	15		Х
16	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other	40		37
4-	assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV	16		Х
17	Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on	47		v
19	Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I (see instructions) Did the organization report more than \$15,000 total of fundraising event gross income and contributions on	17		X
18	Part VIII lines 1s and 9s2 If "Vos " complete Schodule C. Part II	18		х
19	Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a?	10		-22
19	If "Yes," complete Schedule G, Part III	19		х
20a	Did the averagination apparets and average hospital facilities 2. If "Van " apparents a Cahadula II	20a		X
b	If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?	20b		
21	Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or			
	domestic government on Part IX, column (A), line 1? If "Yes," complete Schedule I, Parts I and II	21	x	
_		_		

	Checkist of Required Schedules (Continued)		1	T
22	Did the association report were then \$5 000 of syents or other assistance to a few democratic individuals on		Yes	No
22	Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? If "Yes," complete Schedule I, Parts I and III	22	x	
23	Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the		Λ	
23	organization's current and former officers, directors, trustees, key employees, and highest compensated			
	employees? If "Yes," complete Schedule J	23		х
24a	Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than			
	\$100,000 as of the last day of the year, that was issued after December 31, 2002? If "Yes," answer lines 24b			
	through 24d and complete Schedule K. If "No," go to line 25a	24a		Х
b	Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?	24b		
С	Did the organization maintain an escrow account other than a refunding escrow at any time during the year			
	to defease any tax-exempt bonds?	24c		
d	Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?	24d		
25a	Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit			
	transaction with a disqualified person during the year? If "Yes," complete Schedule L, Part I	25a		Х
b				
	year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ?			37
00	If "Yes," complete Schedule L, Part I	25b		Х
26	Did the organization report any amount on Part X, line 5 or 22, for receivables from or payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35%			
	controlled entity or family member of any of these persons? If "Yes," complete Schedule L, Part II	26		х
27	Did the organization provide a grant or other assistance to any current or former officer, director, trustee, key	20		21
21	employee, creator or founder, substantial contributor or employee thereof, a grant selection committee			
	member, or to a 35% controlled entity (including an employee thereof) or family member of any of these			
	persons? If "Yes," complete Schedule L, Part III	27		х
28	Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part			
	IV instructions, for applicable filing thresholds, conditions, and exceptions):			
а	A current or former officer, director, trustee, key employee, creator or founder, or substantial contributor? If			
	"Yes," complete Schedule L, Part IV	28a		X
b	A family member of any individual described in line 28a? If "Yes," complete Schedule L, Part IV	28b		Х
С	A 35% controlled entity of one or more individuals and/or organizations described in lines 28a or 28b? If			
	"Yes," complete Schedule L, Part IV	28c		X
29	Did the organization receive more than \$25,000 in non-cash contributions? If "Yes," complete Schedule M	29	X	
30	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified	-		37
24	conservation contributions? If "Yes," complete Schedule M	30		X
31 32	Did the organization liquidate, terminate, or dissolve and cease operations? <i>If "Yes," complete Schedule N, Part I</i> Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? <i>If "Yes,"</i>	31		Λ
32	complete Schedule N, Part II	32		х
33	Did the organization own 100% of an entity disregarded as separate from the organization under Regulations	. 02		
•	sections 301.7701-2 and 301.7701-3? If "Yes," complete Schedule R, Part I	33		х
34	Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III,			
	or IV, and Part V, line 1	34		х
35a	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	35a		X
b	If "Yes" to line 35a, did the organization receive any payment from or engage in any transaction with a			
	controlled entity within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2	35b		
36	Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable			
	related organization? If "Yes," complete Schedule R, Part V, line 2	36		X
37	Did the organization conduct more than 5% of its activities through an entity that is not a related organization			
	and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI	37		Х
38	Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and	-	3 7	
D	19? Note: All Form 990 filers are required to complete Schedule O.	38	X	
P	Statements Regarding Other IRS Filings and Tax Compliance Check if Schedule O contains a response or note to any line in this Part V			
	Officer if confedure o contains a response of flote to any line in this part v		Yes	No
1a	Enter the number reported in Box 3 of Form 1096. Enter -0- if not applicable 1a 14		163	140
b	Enter the number of Forms W-2G included in line 1a. Enter -0- if not applicable 1b 0			
c	Did the organization comply with backup withholding rules for reportable payments to vendors and			
	reportable gaming (gambling) winnings to prize winners?	. 1c	х	
			===	

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Statements Regarding Other IRS Filings and Tax Compliance (continued) Yes No 2a Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return X b If at least one is reported on line 2a, did the organization file all required federal employment tax returns? **Note:** If the sum of lines 1a and 2a is greater than 250, you may be required to *e-file* (see instructions) Did the organization have unrelated business gross income of \$1,000 or more during the year? Х 3a If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation on Schedule O At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)? X If "Yes." enter the name of the foreign country See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR). 5a Was the organization a party to a prohibited tax shelter transaction at any time during the tax year? Х 5a Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction? If "Yes" to line 5a or 5b, did the organization file Form 8886-T? Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit any contributions that were not tax deductible as charitable contributions? X b If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible? 6b 7 Organizations that may receive deductible contributions under section 170(c). Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor? X 7a If "Yes," did the organization notify the donor of the value of the goods or services provided? Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was Did the organization sell, exchange, or other increases a required to file Form 8282? Х **d** If "Yes," indicate the number of Forms 8282 filed during the year ______ Х Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract? Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract? 7f If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required? 7g h If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098-C? 8 Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year? X Sponsoring organizations maintaining donor advised funds. 9 X Did the sponsoring organization make any taxable distributions under section 4966? Did the sponsoring organization make a distribution to a donor, donor advisor, or related person? b Х Section 501(c)(7) organizations. Enter: 10 Initiation fees and capital contributions included on Part VIII, line 12 10a Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities b Section 501(c)(12) organizations. Enter: Gross income from members or shareholders Gross income from other sources (Do not net amounts due or paid to other sources against amounts due or received from them.) 11b 12a 12a Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041? **b** If "Yes," enter the amount of tax-exempt interest received or accrued during the year Section 501(c)(29) qualified nonprofit health insurance issuers. Is the organization licensed to issue qualified health plans in more than one state? 13a Note: See the instructions for additional information the organization must report on Schedule O. Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans 13b c Enter the amount of reserves on hand X **14a** Did the organization receive any payments for indoor tanning services during the tax year? 14b If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation on Schedule O 15 Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or excess parachute payment(s) during the year? Х If "Yes," see instructions and file Form 4720, Schedule N. X Is the organization an educational institution subject to the section 4968 excise tax on net investment income?

Form **990** (2019)

If "Yes," complete Form 4720, Schedule O.

Form 990 (2019) Henry County Community Foundation, 31-1170412 Governance, Management, and Disclosure For each "Yes" response to lines 2 through 7b below, and for a "No" response to line 8a, 8b, or 10b below, describe the circumstances, processes, or changes on Schedule O. See instructions. Check if Schedule O contains a response or note to any line in this Part VI Section A. Governing Body and Management Yes No 1a Enter the number of voting members of the governing body at the end of the tax year 17 If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain on Schedule O. Enter the number of voting members included on line 1a, above, who are independent 16 1b Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee? X Did the organization delegate control over management duties customarily performed by or under the direct 3 X supervision of officers, directors, trustees, or key employees to a management company or other person? 4 Did the organization make any significant changes to its governing documents since the prior Form 990 was filed? Did the organization become aware during the year of a significant diversion of the organization's assets? 6 Did the organization have members or stockholders? 7a Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more members of the governing body? **b** Are any governance decisions of the organization reserved to (or subject to approval by) members, Х stockholders, or persons other than the governing body? Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following: The governing body? 8a **b** Each committee with authority to act on behalf of the governing body? 8b Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses on Schedule O Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code. Yes No **10a** Did the organization have local chapters, branches, or affiliates? Х 10a **b** If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes? 10b **11a** Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form? 11a **b** Describe in Schedule O the process, if any, used by the organization to review this Form 990. **12a** Did the organization have a written conflict of interest policy? *If "No," go to line 13* 12a b Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts? 12b c Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," X describe in Schedule O how this was done 12c Did the organization have a written whistleblower policy? X 13 13 Did the organization have a written document retention and destruction policy? 14 Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision? The organization's CEO, Executive Director, or top management official X 15a X Other officers or key employees of the organization 15b If "Yes" to line 15a or 15b, describe the process in Schedule O (see instructions). Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a taxable entity during the year? 16a Х b If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's exempt status with respect to such arrangements? Section C. Disclosure List the states with which a copy of this Form 990 is required to be filed ▶ IN Section 6104 requires an organization to make its Forms 1023 (1024 or 1024-A, if applicable), 990, and 990-T (Section 501(c) (3)s only) available for public inspection. Indicate how you made these available. Check all that apply. Own website **X** Another's website **X** Upon request Other (explain on Schedule O) Describe on Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year. State the name, address, and telephone number of the person who possesses the organization's books and records >

PO Box 6006

IN 47362-6006 765-529-2235
Form 990 (2019)

Beverly Matthews

New Castle

Form 990 (2019) Henry County Community Foundation, 31-1170412

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Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Check if Schedule O contains a response or note to any line in this Part VII

Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

- 1a Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.
- List all of the organization's **current** officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid.
 - List all of the organization's current key employees, if any. See instructions for definition of "key employee."
- List the organization's five **current** highest compensated employees (other than an officer, director, trustee, or key employee) who received reportable compensation (Box 5 of Form W-2 and/or Box 7 of Form 1099-MISC) of more than \$100,000 from the organization and any related organizations.
- List all of the organization's **former** officers, key employees, and highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations.
- List all of the organization's **former directors or trustees** that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations. See instructions for the order in which to list the persons above.

See instructions for the order in when the control of the characteristics control of the control						izatio	n c	ompensated any current o	officer, director, or trustee	
(A) Name and title	(B) Average hours per week (list any	box	Position do not check more than one lox, unless person is both an officer and a director/trustee)			is both	an	(D) Reportable compensation from the organization	(E) Reportable compensation from related organizations	(F) Estimated amount of other compensation from the
	hours for related organizations below dotted line)	Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	(W-2/1099-MISC)	(W-2/1099-MISC)	organization and related organizations
(1)Beverly Matthew										
	40.00								_	
Executive Director	0.00			Х				83,000	0	0
(2)Marsha Gratner	1.00									
Chair	0.00	x		х				0	0	0
(3) Mike Broyles	3.33									
(*,=====	1.00									
1st Vice Chair	0.00	X		Х				0	0	0
(4) Carrie Barrett										
	1.00									
2nd Vice Chair	0.00	X		Х				0	0	0
(5) Susan Falck-Nea	1									
	1.00									
Treasurer	0.00	X		X				0	0	0
(6) Richard Armstro										
	1.00							_	_	_
Director	0.00	X						0	0	0
(7) Josh Estelle										
<u> </u>	1.00	.								
Director	0.00	Х						0	0	0
(8)Rebecca Gonya	1 00									
Director	1.00	X						0	0	0
(9) Cathy Hamiliton		Λ						0	0	<u> </u>
(9) Cacity Hamiliticon	1.00									
Director	0.00	X						0	0	0
(10)Jon Madison	0.00									
(10,0011 110012011	1.00									
Director	0.00	X						0	0	0
(11)Kevin Neal										
	1.00									
Director	0.00	X						0	0	0

Form 990 (2019) Henry County (Community	Foundation.	, 31-1170412
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per week bo			(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)					(D) Reportable compensation from the organization	(E) Reportable compensation from related organizations	(F) Estimated amount of other compensation from the
	hours for related organizations below dotted line)	Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	(W-2/1099-MISC)	(W-2/1099-MISC)	organization and related organizations
(12) Jeff Pfaff	1.00									
Director (13) John Pidgeon	0.00	X						0	0	0
Director	1.00	x						o	0	0
(14) Frank Schweg	man 1.00									
Director (15) Kyle Siewert	0.00	X						0	0	0
	1.00									
Director (16) Maribeth Tay	0.00 lor	Х						0	0	0
Director	1.00	x						0	0	0
(17) Mark Taylor	1.00									
Director	0.00	X						0	0	0
1b Subtotal							•	83,000		
c Total from continuation sho d Total (add lines 1b and 1c)				<u></u>			>	83,000		
2 Total number of individuals (i reportable compensation from	ncluding but no n the organizati	t lim on ▶	ited '	to th	ose	liste	d ab	oove) who received more t	than \$100,000 of	
3 Did the organization list any temployee on line 1a? If "Yes	," complete Sch	iedu	le J i	for s	uch	indiv	ridua	al .		Yes No
For any individual listed on lin organization and related orga individual	anizations great	er th	an \$	150	,000	? <i>If</i>	"Yes	s," complete Schedule J fo	or such	4 X
individualDid any person listed on line for services rendered to the company	1a receive or a organization? If	ccru "Ye:	e co s," co	mpe o <i>mpi</i>	nsat lete	ion f	rom edule	any unrelated organization and unrelated organization and unrelated organization	on or individual	5 X
Section B. Independent Contract 1 Complete this table for your f		nen	sate	d inc	lene	ndei	nt co	ontractors that received m	ore than \$100,000 of	
compensation from the organ	nization. Report (A) I business address	con	pen	satio	n fo	r the	cal	endar year ending with or	within the organization's (B) tion of services	tax year. (C) Compensation
Name and	l business address							Descrip	tión of services	Compensation
2 Total number of independent	contractors (in	cludi	na b	ut n	ot lin	nited nizat	to t	:hose listed above) who		

Part VIII Statement of Revenue Check if Schedule O contains a response or note to any line in this Part VIII (**D**)
Revenue excluded from tax under (C) (B) Related or exempt Unrelated function revenue business revenue sections 512-514 Contributions, Gifts, Grants and Other Similar Amounts 1a Federated campaigns 1a **b** Membership dues 1b **c** Fundraising events 1c **d** Related organizations 1d e Government grants (contributions) **f** All other contributions, gifts, grants, and similar amounts not included above 3,007,406 1f 122,639 1g \$ g Noncash contributions included in lines 1a-1f 3,007,406 h Total. Add lines 1a-1f Business Code Program Service Revenue 561000 443,586 443,586 Administrative Fees **f** All other program service revenue 443,586 g Total. Add lines 2a-2f Investment income (including dividends, interest, and 12,209 722,024 734,233 other similar amounts) Income from investment of tax-exempt bond proceeds Royalties (ii) Personal 7,800 6a Gross rents 6a **b** Less: rental expenses 6b 7,800 c Rental inc. or (loss) d Net rental income or (loss) 7,800 7,800 **7a** Gross amount from (ii) Other (i) Securities sales of assets 13,996,752 18,138 7a other than inventory Other Revenue **b** Less: cost or other 13,735,744 basis and sales exps. 7b c Gain or (loss) 261,008 18,138 7с 279,146 18,138 261,008 d Net gain or (loss) **8a** Gross income from fundraising events (not including \$ of contributions reported on line 1c). See Part IV, line 18 8a **b** Less: direct expenses c Net income or (loss) from fundraising events ▶ **9a** Gross income from gaming activities. See Part IV, line 19 **b** Less: direct expenses 9b c Net income or (loss) from gaming activities 10a Gross sales of inventory, less 10a returns and allowances **b** Less: cost of goods sold 10b c Net income or (loss) from sales of inventory **Business Code** 900099 24,560 24,560 FEG I 11a 5,550 5,550 Miscellaneous 525990 -1 Sig Guff -54,906 **d** All other revenue -54,906 e Total. Add lines 11a-11d ... -24,797 $-12,20\overline{9}$ 4,447,374 455,795 996,382 Total revenue. See instructions

Part IX Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A). Check if Schedule O contains a response or note to any line in this Part IX (A) Total expenses (B) Program service (C) Management and **(D)** Fundraising Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII. expenses general expenses expenses Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21 1,171,524 1,171,524 Grants and other assistance to domestic individuals. See Part IV, line 22 398,825 398,825 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16 Benefits paid to or for members Compensation of current officers, directors, trustees, and key employees 83,000 27,390 29,050 26,560 Compensation not included above to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B) Other salaries and wages 121,481 40,089 42,518 38,874 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions) Other employee benefits 6,212 2,050 2,174 1,988 Payroll taxes 5,242 5,559 5,083 15,884 10 Fees for services (nonemployees): 443,596 443,596 a Management **b** Legal c Accounting 12,809 4,227 4,483 4,099 **d** Lobbying e Professional fundraising services. See Part IV, line 17 Investment management fees 230,847 230,847 **g** Other. (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O.) 19,150 19,150 12 Advertising and promotion Office expenses 11,891 11,529 36,030 12,610 13 Information technology 14 Royalties 19,331 6,378 6,767 6,186 Occupancy 16 5,830 1,923 2,041 1,866 17 Travel Payments of travel or entertainment expenses for any federal, state, or local public officials 11,116 19 Conferences, conventions, and meetings 3,668 3,891 3,557 20 Payments to affiliates 21 $8,\overline{110}$ 8,602 24,577 7,865 Depreciation, depletion, and amortization 22 7,991 2,797 2,637 2,557 24 Other expenses. Itemize expenses not covered above (List miscellaneous expenses on line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.) a Fundraising 62,144 62,144 26,800 Program Expenses 26,800 Lilly Intern Expenses 9,342 7,438 995 909 1,321 Memberships and Dues 4,003 1,401 1,281 e All other expenses 2,345 779 810 756 2,712,837 1,720,292 817,291 175,254 25 Total functional expenses. Add lines 1 through 24e . Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here following SOP 98-2 (ASC 958-720)

Part	Check if Schedule O contains a response or	note to any lin	e in this Part X		<u> </u>			
				(A) Beginning of year		(B) End of year		
1				100	1	100		
2			2,045,106	2	1,215,081			
3				14,908	3	11,574		
4				7,795	4			
5	Loans and other receivables from any current or fo	rmer officer, d	irector,					
	trustee, key employee, creator or founder, substan	tial contributor	r, or 35%					
	controlled entity or family member of any of these	persons			5			
6								
3	under section 4958(f)(1)), and persons described i				6			
7	Notes and loans receivable, net				7			
8 1	Inventories for sale or use				8			
9					9	32,919		
10	a Land, buildings, and equipment: cost or other							
	basis. Complete Part VI of Schedule D	10a	748,721					
ı	b Less: accumulated depreciation	10b	308,065	434,914	10c	440,656		
11	Investments—publicly traded securities			36,245,410	11	43,737,116		
12	Investments—other securities. See Part IV, line 11		5,249	12	5,513			
13	,	l			13			
14				14				
15				15				
16	Total assets. Add lines 1 through 15 (must equal		38,753,482	16	45,442,959			
17			26,933	17	34,310			
18	Grants payable		25,157	18	2,075			
19	Deferred revenue		210,503	19				
20	Tax-exempt bond liabilities				20			
21	Escrow or custodial account liability. Complete Par	t IV of Schedu	ıle D		21			
22	, ,							
	trustee, key employee, creator or founder, substan							
	controlled entity or family member of any of these	persons			22			
23		d third parties			23			
24	1 7				24			
25	()							
	parties, and other liabilities not included on lines 1	-24). Complet	te Part X	064 611		010 000		
	of Schedule D			864,611	25	919,022		
26	5			1,127,204	26	955,407		
n D	Organizations that follow FASB ASC 958, check	c nere 🔼						
<u> </u>	and complete lines 27, 28, 32, and 33.			909 206	27	0/2 512		
27	Not accete with denon-nectrications		898,396	27	943,513 43,544,039			
28				36,727,882	28	43,344,033		
5	Organizations that do not follow FASB ASC 956							
29	and complete lines 29 through 33.			29				
29 2 30		 ment fund			30			
30 2 31	Retained earnings endowment accumulated inco	Paid-in or capital surplus, or land, building, or equipment fund Retained earnings, endowment, accumulated income, or other funds						
27 28 29 30 31 32 32 32 32 32 32 32 32 32 32 32 32 32	Total net assets or fund balances	ne, or other to		37,626,278	31	44,487,552		
9 32 33				38,753,482	33	45,442,959		
33	rotal liabilities and het assets/fund balances			30,133,402	აა	5 000 (0.40)		

Form **990** (2019)

Schedule O.

orn	n 990 (2019) Henry County Community Foundation, 31-1170412				Pag	ge 12
	art XI Reconciliation of Net Assets					
	Check if Schedule O contains a response or note to any line in this Part XI					X
1	Total revenue (must equal Part VIII, column (A), line 12)	1	4	,44	7,	374
2	Total expenses (must equal Part IX, column (A), line 25)	2	2	, 71	2,8	837
3	Revenue less expenses. Subtract line 2 from line 1	2	1	,73	34,	537
4	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A))	4				278
5	Net unrealized gains (losses) on investments	5				622
6	Donated services and use of facilities	6				
7	Investment expenses					
8	Prior period adjustments	0				
9	Other changes in net assets or fund balances (explain on Schedule O)			-13	33,8	885
10	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line					
	32, column (B))	. 10	44	,48	37,	552
Pa	art XII Financial Statements and Reporting					
	Check if Schedule O contains a response or note to any line in this Part XII					
			_		Yes	No
1	Accounting method used to prepare the Form 990: Cash X Accrual Other					
	If the organization changed its method of accounting from a prior year or checked "Other," explain in					
	Schedule O.					
2a	Were the organization's financial statements compiled or reviewed by an independent accountant?		L	2a		X
	If "Yes," check a box below to indicate whether the financial statements for the year were compiled or					
	reviewed on a separate basis, consolidated basis, or both:					
	Separate basis Consolidated basis Both consolidated and separate basis					
b	Were the organization's financial statements audited by an independent accountant?		L	2b	X	
	If "Yes," check a box below to indicate whether the financial statements for the year were audited on a					
	separate basis, consolidated basis, or both:					
	X Separate basis Consolidated basis Both consolidated and separate basis					
С	If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of					
	the audit, review, or compilation of its financial statements and selection of an independent accountant?			2c	X	
	If the organization changed either its oversight process or selection process during the tax year, explain on					

3a As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133?
 b If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the

required audit or audits, explain why on Schedule O and describe any steps taken to undergo such audits

Form **990** (2019)

3a

3b

X

SCHEDULE A

(Form 990 or 990-EZ)

Department of the Treasury Internal Revenue Service

Public Charity Status and Public Support

Complete if the organization is a section 501(c)(3) organization or a section 4947(a)(1) nonexempt charitable trust.

► Attach to Form 990 or Form 990-EZ.

Go to www.irs.gov/Form990 for instructions and the latest information.

2019

Open to Public Inspection

Name of the organization

Henry County Community Foundation, Inc.

Employer identification number 31-1170412

Reason for Public Charity Status (All organizations must complete this part.) See instructions. The organization is not a private foundation because it is: (For lines 1 through 12, check only one box.) 1 A church, convention of churches, or association of churches described in section 170(b)(1)(A)(i). 2 A school described in section 170(b)(1)(A)(ii). (Attach Schedule E (Form 990 or 990-EZ).) 3 A hospital or a cooperative hospital service organization described in section 170(b)(1)(A)(iii). 4 A medical research organization operated in conjunction with a hospital described in section 170(b)(1)(A)(iii). Enter the hospital's name, city, and state: An organization operated for the benefit of a college or university owned or operated by a governmental unit described in 5 section 170(b)(1)(A)(iv). (Complete Part II.) 6 A federal, state, or local government or governmental unit described in section 170(b)(1)(A)(v). An organization that normally receives a substantial part of its support from a governmental unit or from the general public 7 X described in section 170(b)(1)(A)(vi). (Complete Part II.) 8 A community trust described in **section 170(b)(1)(A)(vi)**. (Complete Part II.) An agricultural research organization described in section 170(b)(1)(A)(ix) operated in conjunction with a land-grant college 9 or university or a non-land-grant college of agriculture (see instructions). Enter the name, city, and state of the college or 10 An organization that normally receives: (1) more than 33 1/3% of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions—subject to certain exceptions, and (2) no more than 33 1/3% of its support from gross investment income and unrelated business taxable income (less section 511 tax) from businesses acquired by the organization after June 30, 1975. See section 509(a)(2). (Complete Part III.) An organization organized and operated exclusively to test for public safety. See section 509(a)(4). 11 An organization organized and operated exclusively for the benefit of, to perform the functions of, or to carry out the purposes of one or more publicly supported organizations described in section 509(a)(1) or section 509(a)(2). See section 509(a)(3). Check the box in lines 12a through 12d that describes the type of supporting organization and complete lines 12e, 12f, and 12g. Type I. A supporting organization operated, supervised, or controlled by its supported organization(s), typically by giving the supported organization(s) the power to regularly appoint or elect a majority of the directors or trustees of the supporting organization. You must complete Part IV, Sections A and B. Type II. A supporting organization supervised or controlled in connection with its supported organization(s), by having control or management of the supporting organization vested in the same persons that control or manage the supported organization(s). You must complete Part IV, Sections A and C. Type III functionally integrated. A supporting organization operated in connection with, and functionally integrated with, its supported organization(s) (see instructions). You must complete Part IV, Sections A, D, and E. Type III non-functionally integrated. A supporting organization operated in connection with its supported organization(s) that is not functionally integrated. The organization generally must satisfy a distribution requirement and an attentiveness requirement (see instructions). You must complete Part IV, Sections A and D, and Part V. Check this box if the organization received a written determination from the IRS that it is a Type I, Type II, Type III functionally integrated, or Type III non-functionally integrated supporting organization. Enter the number of supported organizations Provide the following information about the supported organization(s). (ii) EIN (iv) Is the organization (i) Name of supported (iii) Type of organization (v) Amount of monetary (vi) Amount of listed in your governing organization (described on lines 1-10 support (see other support (see document? above (see instructions)) instructions) instructions) Yes Νo (A) (B) (C) (D) (E)

Schedule A (Form 990 or 990-EZ) 2019

Support Schedule for Organizations Described in Sections 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi) (Complete only if you checked the box on line 5, 7, or 8 of Part I or if the organization failed to qualify under Part III. If the organization fails to qualify under the tests listed below, please complete Part III.) Section A. Public Support Calendar year (or fiscal year beginning in) (a) 2015 **(b)** 2016 (c) 2017 (d) 2018 (e) 2019 (f) Total Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.") 1,226,051 629,704 2,760,089 3,782,663 3,007,406 11,405,913 Tax revenues levied for the organization's benefit and either paid to or expended on its behalf The value of services or facilities furnished by a governmental unit to the organization without charge Total. Add lines 1 through 3 1,226,051 629,704 2,760,089 3,782,663 3,007,406 11,405,913 The portion of total contributions by each person (other than a governmental unit or publicly supported organization) included on line 1 that exceeds 2% of the amount shown on line 11, column (f) 4,682,433 Public support. Subtract line 5 from line 4 6,723,480 Section B. Total Support Calendar year (or fiscal year beginning in) (a) 2015 (b) 2016 (d) 2018 (e) 2019 (c) 2017 (f) Total Amounts from line 4 1,226,051 2,760,089 3,782,663 3,007,406 11,405,913 629,704 Gross income from interest, dividends, payments received on securities loans. rents, royalties, and income from 736,183 823,004 536,349 603,040 729,824 3,428,400 similar sources Net income from unrelated business activities, whether or not the business 12,603 12,603 is regularly carried on Other income. Do not include gain or loss from the sale of capital assets 11,158 14,359 5,550 (Explain in Part VI.) 17,330 13,653 62,050 11 **Total support.** Add lines 7 through 10 14,908,966 12 Gross receipts from related activities, etc. (see instructions) 1 261 977

	Gloss receipts from related activities, etc. (See instructions)	12	1,201,311					
13	First five years. If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3)	•						
	organization, check this box and stop here		▶					
Sec	ction C. Computation of Public Support Percentage							
14	Public support percentage for 2019 (line 6, column (f) divided by line 11, column (f))	14	45.10%					
15	Public support percentage from 2018 Schedule A, Part II, line 14	15	46.52%					
16a	33 1/3% support test—2019. If the organization did not check the box on line 13, and line 14 is 33 1/3% or more, check the	nis						
	box and stop here . The organization qualifies as a publicly supported organization		▶ X					
b	33 1/3% support test—2018. If the organization did not check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check a box on line 15 is 33 1/3% or more, check a box on line 15 is 30 1/3% or more, ch	eck						
	this box and stop here . The organization qualifies as a publicly supported organization		▶ □					
17a	10%-facts-and-circumstances test—2019. If the organization did not check a box on line 13, 16a, or 16b, and line 14 is							
	10% or more, and if the organization meets the "facts-and-circumstances" test, check this box and stop here. Explain in							
	Part VI how the organization meets the "facts-and-circumstances" test. The organization qualifies as a publicly supported							
	organization							
b	10%-facts-and-circumstances test—2018. If the organization did not check a box on line 13, 16a, 16b, or 17a, and line							
	15 is 10% or more, and if the organization meets the "facts-and-circumstances" test, check this box and stop here.							
	Explain in Part VI how the organization meets the "facts-and-circumstances" test. The organization qualifies as a publicly		_					
	supported organization		▶ ∐					
18	Private foundation. If the organization did not check a box on line 13, 16a, 16b, 17a, or 17b, check this box and see							
	instructions		▶ ∐					

Page 3

Schedule A (Form 990 or 990-EZ) 2019

(Complete only if you checked the box on line 10 of Part I or if the organization failed to qualify under Part II. If the organization fails to qualify under the tests listed below, please complete Part II.)

Sec	tion A. Public Support	-		•			
	ndar year (or fiscal year beginning in)	(a) 2015	(b) 2016	(c) 2017	(d) 2018	(e) 2019	(f) Total
1	Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.")						
2	Gross receipts from admissions, merchandise sold or services performed, or facilities furnished in any activity that is related to the organization's tax-exempt purpose						
3	Gross receipts from activities that are not an unrelated trade or business under section 513						
4	Tax revenues levied for the organization's benefit and either paid to or expended on its behalf						
5	The value of services or facilities furnished by a governmental unit to the organization without charge						
6	Total. Add lines 1 through 5						
7a	Amounts included on lines 1, 2, and 3 received from disqualified persons						
b	Amounts included on lines 2 and 3 received from other than disqualified persons that exceed the greater of \$5,000 or 1% of the amount on line 13 for the year						
С	Add lines 7a and 7b						
8	Public support. (Subtract line 7c from line 6.)						
Sec	tion B. Total Support						
	ndar year (or fiscal year beginning in)	(a) 2015	(b) 2016	(c) 2017	(d) 2018	(e) 2019	(f) Total
9	Amounts from line 6	(4) 20.0	(2) 2010	(0) 20 11	(4) 20:0	(0) = 0.0	(1) 1000
10a	Gross income from interest, dividends, payments received on securities loans, rents, royalties, and income from similar sources.						
b	Unrelated business taxable income (less section 511 taxes) from businesses acquired after June 30, 1975						
С	Add lines 10a and 10b						
11	Net income from unrelated business activities not included in line 10b, whether or not the business is regularly carried on						
12	Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.)						
13	Total support. (Add lines 9, 10c, 11, and 12.)						
14	First five years. If the Form 990 is for the organization, check this box and stop he	•			•	n 501(c)(3)	▶ □
Sec	tion C. Computation of Public S						
15	Public support percentage for 2019 (line	8, column (f), div	ided by line 13, co	olumn (f))		15	%
16	Public support percentage from 2018 Sc	hedule A, Part III	, line 15			16	%
Sec	tion D. Computation of Investm	ent Income F	Percentage				
17	Investment income percentage for 2019			e 13, column (f))			%
18	Investment income percentage from 201						%
19a	33 1/3% support tests—2019. If the org						,
b	17 is not more than 33 1/3%, check this 33 1/3% support tests—2018. If the org	-	_			-	▶ ∐ and
J	line 18 is not more than 33 1/3%, check						
20	Private foundation. If the organization of	-	_			-	

Schedule A (Form 990 or 990-EZ) 2019

Part IV **Supporting Organizations**

(Complete only if you checked a box in line 12 on Part I. If you checked 12a of Part I, complete Sections A and B. If you checked 12b of Part I, complete Sections A and C. If you checked 12c of Part I, complete Sections A, D, and E. If you checked 12d of Part I, complete Sections A and D, and complete Part V.)

Section A. All Supporting Organizations

- Are all of the organization's supported organizations listed by name in the organization's governing documents? If "No," describe in Part VI how the supported organizations are designated. If designated by class or purpose, describe the designation. If historic and continuing relationship, explain.
- Did the organization have any supported organization that does not have an IRS determination of status under section 509(a)(1) or (2)? If "Yes," explain in Part VI how the organization determined that the supported organization was described in section 509(a)(1) or (2).
- 3a Did the organization have a supported organization described in section 501(c)(4), (5), or (6)? If "Yes," answer (b) and (c) below.
- Did the organization confirm that each supported organization qualified under section 501(c)(4), (5), or (6) and satisfied the public support tests under section 509(a)(2)? If "Yes," describe in Part VI when and how the organization made the determination.
- Did the organization ensure that all support to such organizations was used exclusively for section 170(c)(2)(B) purposes? If "Yes," explain in Part VI what controls the organization put in place to ensure such use.
- 4a Was any supported organization not organized in the United States ("foreign supported organization")? If "Yes," and if you checked 12a or 12b in Part I, answer (b) and (c) below.
- Did the organization have ultimate control and discretion in deciding whether to make grants to the foreign supported organization? If "Yes," describe in Part VI how the organization had such control and discretion despite being controlled or supervised by or in connection with its supported organizations.
- Did the organization support any foreign supported organization that does not have an IRS determination under sections 501(c)(3) and 509(a)(1) or (2)? If "Yes," explain in Part VI what controls the organization used to ensure that all support to the foreign supported organization was used exclusively for section 170(c)(2)(B)
- 5a Did the organization add, substitute, or remove any supported organizations during the tax year? If "Yes," answer (b) and (c) below (if applicable). Also, provide detail in Part VI, including (i) the names and EIN numbers of the supported organizations added, substituted, or removed; (ii) the reasons for each such action; (iii) the authority under the organization's organizing document authorizing such action; and (iv) how the action was accomplished (such as by amendment to the organizing document).
- Type I or Type II only. Was any added or substituted supported organization part of a class already designated in the organization's organizing document?
- Substitutions only. Was the substitution the result of an event beyond the organization's control? С
- Did the organization provide support (whether in the form of grants or the provision of services or facilities) to anyone other than (i) its supported organizations, (ii) individuals that are part of the charitable class benefited by one or more of its supported organizations, or (iii) other supporting organizations that also support or benefit one or more of the filing organization's supported organizations? If "Yes," provide detail in Part VI.
- Did the organization provide a grant, loan, compensation, or other similar payment to a substantial contributor (as defined in section 4958(c)(3)(C)), a family member of a substantial contributor, or a 35% controlled entity with regard to a substantial contributor? If "Yes," complete Part I of Schedule L (Form 990 or 990-EZ).
- Did the organization make a loan to a disqualified person (as defined in section 4958) not described in line 7? If "Yes," complete Part I of Schedule L (Form 990 or 990-EZ).
- Was the organization controlled directly or indirectly at any time during the tax year by one or more 9a disqualified persons as defined in section 4946 (other than foundation managers and organizations described in section 509(a)(1) or (2))? If "Yes," provide detail in Part VI.
- Did one or more disqualified persons (as defined in line 9a) hold a controlling interest in any entity in which the supporting organization had an interest? If "Yes," provide detail in Part VI.
- Did a disqualified person (as defined in line 9a) have an ownership interest in, or derive any personal benefit from, assets in which the supporting organization also had an interest? If "Yes," provide detail in Part VI.
- Was the organization subject to the excess business holdings rules of section 4943 because of section 10a 4943(f) (regarding certain Type II supporting organizations, and all Type III non-functionally integrated supporting organizations)? If "Yes," answer 10b below.
 - Did the organization have any excess business holdings in the tax year? (Use Schedule C, Form 4720, to determine whether the organization had excess business holdings.)

1		
2		
3a		
3b		
3c		
4a		
4b		
4c		
5a		
5b 5c		
7		
8		
9a		
9b		
9c		
10a		
10b Form 990	or 990-l	EZ) 2019

	the A (Form 990 of 990-E2) 2019 Helity Community Foundation, 31-11/04	14		Page :
Pai	rt IV Supporting Organizations (continued)		Vaa	No
44	Lieu the agreement in account of a rift or contribution from any of the following response		Yes	No
11	Has the organization accepted a gift or contribution from any of the following persons? A person who directly or indirectly controls, either alone or together with persons described in (b) and (c)			
а	below, the governing body of a supported organization?	11a		
h	A family member of a person described in (a) above?	11b		
	A 35% controlled entity of a person described in (a) or (b) above? <i>If</i> "Yes" to a, b, or c, provide detail in Part VI.	11c		
	tion B. Type I Supporting Organizations	110		
0000	ion B. Type i Supporting Siguinzations		Yes	No
1	Did the directors, trustees, or membership of one or more supported organizations have the power to		163	140
•	regularly appoint or elect at least a majority of the organization's directors or trustees at all times during the			
	tax year? If "No," describe in Part VI how the supported organization(s) effectively operated, supervised, or			
	controlled the organization's activities. If the organization had more than one supported organization,			
	describe how the powers to appoint and/or remove directors or trustees were allocated among the supported			
	organizations and what conditions or restrictions, if any, applied to such powers during the tax year.	1		
2	Did the organization operate for the benefit of any supported organization other than the supported	•		
_	organization(s) that operated, supervised, or controlled the supporting organization? If "Yes," explain in Part			
	VI how providing such benefit carried out the purposes of the supported organization(s) that operated,			
	supervised, or controlled the supporting organization.	2		
Sect	tion C. Type II Supporting Organizations			
	Jin saffa da		Yes	No
1	Were a majority of the organization's directors or trustees during the tax year also a majority of the directors			
	or trustees of each of the organization's supported organization(s)? If "No," describe in Part VI how control			
	or management of the supporting organization was vested in the same persons that controlled or managed			
	the supported organization(s).	1		
Sect	tion D. All Type III Supporting Organizations			
	J. 11 9 9		Yes	No
1	Did the organization provide to each of its supported organizations, by the last day of the fifth month of the			
	organization's tax year, (i) a written notice describing the type and amount of support provided during the prior tax			
	year, (ii) a copy of the Form 990 that was most recently filed as of the date of notification, and (iii) copies of the			
	organization's governing documents in effect on the date of notification, to the extent not previously provided?	1		
2	Were any of the organization's officers, directors, or trustees either (i) appointed or elected by the supported			
	organization(s) or (ii) serving on the governing body of a supported organization? If "No," explain in Part VI how			
	the organization maintained a close and continuous working relationship with the supported organization(s).	2		
3	By reason of the relationship described in (2), did the organization's supported organizations have a			
	significant voice in the organization's investment policies and in directing the use of the organization's			
	income or assets at all times during the tax year? If "Yes," describe in Part VI the role the organization's			
	supported organizations played in this regard.	3		
Sect	tion E. Type III Functionally-Integrated Supporting Organizations			
1	Check the box next to the method that the organization used to satisfy the Integral Part Test during the year (see instruction)	ctions).		
а	The organization satisfied the Activities Test. Complete line 2 below.			
b	The organization is the parent of each of its supported organizations. <i>Complete line 3 below.</i>			
С	The organization supported a governmental entity. Describe in Part VI how you supported a government entity (see	instructio	ons).	
		ſ		
2	Activities Test. <i>Answer (a) and (b) below.</i>		Yes	No
а	Did substantially all of the organization's activities during the tax year directly further the exempt purposes of			
	the supported organization(s) to which the organization was responsive? If "Yes," then in Part VI identify			
	those supported organizations and explain how these activities directly furthered their exempt purposes,			
	how the organization was responsive to those supported organizations, and how the organization determined	_		
_	that these activities constituted substantially all of its activities.	2a		
b				
	of the organization's supported organization(s) would have been engaged in? If "Yes," explain in Part VI the			
	reasons for the organization's position that its supported organization(s) would have engaged in these			
	activities but for the organization's involvement.	2b		
3	Parent of Supported Organizations. Answer (a) and (b) below.			
а	Did the organization have the power to regularly appoint or elect a majority of the officers, directors, or	_		
	trustees of each of the supported organizations? <i>Provide details in Part VI</i> .	3a		
b	Did the organization exercise a substantial degree of direction over the policies, programs, and activities of each	26		

Henry County Community Foundation, 31-1170412 Schedule A (Form 990 or 990-EZ) 2019 Page 6 Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations Check here if the organization satisfied the Integral Part Test as a qualifying trust on Nov. 20, 1970 (explain in Part VI). See instructions. All other Type III non-functionally integrated supporting organizations must complete Sections A through E. (B) Current Year Section A - Adjusted Net Income (A) Prior Year (optional) 1 Net short-term capital gain 2 Recoveries of prior-year distributions 2 Other gross income (see instructions) 3 Add lines 1 through 3. 4 4 **5** Depreciation and depletion 5 6 Portion of operating expenses paid or incurred for production or collection of gross income or for management, conservation, or maintenance of property held for production of income (see instructions) 6 Other expenses (see instructions) 7 Adjusted Net Income (subtract lines 5, 6, and 7 from line 4) 8 (B) Current Year **Section B - Minimum Asset Amount** (A) Prior Year (optional) Aggregate fair market value of all non-exempt-use assets (see instructions for short tax year or assets held for part of year): a Average monthly value of securities 1a **b** Average monthly cash balances 1b **c** Fair market value of other non-exempt-use assets 1c Total (add lines 1a, 1b, and 1c) 1d e Discount claimed for blockage or other factors (explain in detail in Part VI): Acquisition indebtedness applicable to non-exempt-use assets Subtract line 2 from line 1d. 3 3 Cash deemed held for exempt use. Enter 1-1/2% of line 3 (for greater amount, see instructions). 4 Net value of non-exempt-use assets (subtract line 4 from line 3) 5 Multiply line 5 by .035. 6 6 Recoveries of prior-year distributions 7

8	Minimum Asset Amount (add line 7 to line 6)	8	
Sec	tion C - Distributable Amount	Current Year	
1	Adjusted net income for prior year (from Section A, line 8, Column A)	1	
2	Enter 85% of line 1.	2	
3	Minimum asset amount for prior year (from Section B, line 8, Column A)	3	
4	Enter greater of line 2 or line 3.	4	
5	Income tax imposed in prior year	5	
6	Distributable Amount. Subtract line 5 from line 4, unless subject to		· · · · · · · · · · · · · · · · · · ·
en	nergency temporary reduction (see instructions).	6	

Check here if the current year is the organization's first as a non-functionally integrated Type III supporting organization (see instructions)

Schedule A (Form 990 or 990-EZ) 2019

Schedule A (Form 990 or 990-EZ) 2019 Henry County Community Foundation, 31-1170412

Page 7

Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations (continued) Section D - Distributions **Current Year** Amounts paid to supported organizations to accomplish exempt purposes 2 Amounts paid to perform activity that directly furthers exempt purposes of supported organizations, in excess of income from activity Administrative expenses paid to accomplish exempt purposes of supported organizations 3 Amounts paid to acquire exempt-use assets Qualified set-aside amounts (prior IRS approval required) 5 6 Other distributions (describe in Part VI). See instructions. Total annual distributions. Add lines 1 through 6. 7 Distributions to attentive supported organizations to which the organization is responsive (provide details in Part VI). See instructions. Distributable amount for 2019 from Section C, line 6 10 Line 8 amount divided by line 9 amount (i) (ii) (iii) Section E - Distribution Allocations (see instructions) **Excess Distributions** Underdistributions Distributable Pre-2019 Amount for 2019 Distributable amount for 2019 from Section C, line 6 2 Underdistributions, if any, for years prior to 2019 (reasonable cause required-explain in Part VI). See instructions. 3 Excess distributions carryover, if any, to 2019 **a** From 2014 **b** From 2015 **c** From 2016 **d** From 2017 e From 2018 f Total of lines 3a through e **g** Applied to underdistributions of prior years **h** Applied to 2019 distributable amount i Carryover from 2014 not applied (see instructions) j Remainder. Subtract lines 3g, 3h, and 3i from 3f. Distributions for 2019 from Section D, line 7: a Applied to underdistributions of prior years **b** Applied to 2019 distributable amount c Remainder. Subtract lines 4a and 4b from 4. Remaining underdistributions for years prior to 2019, if any. Subtract lines 3g and 4a from line 2. For result greater than zero, explain in Part VI. See instructions. 6 Remaining underdistributions for 2019. Subtract lines 3h and 4b from line 1. For result greater than zero, explain in Part VI. See instructions. Excess distributions carryover to 2020. Add lines 3j and 4c. Breakdown of line 7: a Excess from 2015 **b** Excess from 2016 ... c Excess from 2017 d Excess from 2018 e Excess from 2019

Schedule A (Form 990 or 990-EZ) 2019

	orm 990 or 990-E2				<u> Foundation</u>		Page 8
Part VI						ne 10; Part II, line 17a or	
						a, 11b, and 11c; Part IV, Part IV, Part IV, Section E, lines	
						s 5, 6, and 8; and Part V	
					nal information. (See		COOLIGIT
				-	`	,	
Part I	I, Line	10 - Oth	er Income	Detail			
Wi aaal	1			Ċ	F <i>C</i> F00		
MISCEL	laneous			\$	56,500		
•							

Schedule B (Form 990, 990-EZ, or 990-PF)

Department of the Treasury Internal Revenue Service

Schedule of Contributors

► Attach to Form 990, Form 990-EZ, or Form 990-PF. ► Go to www.irs.gov/Form990 for the latest information. OMB No. 1545-0047

2019

Name of the organization

Henry County Community Foundation, Inc.

Employer identification number

31-1170412

Organization type (check one): Filers of: Section: Form 990 or 990-EZ **X** 501(c)(**3**) (enter number) organization 4947(a)(1) nonexempt charitable trust not treated as a private foundation 527 political organization Form 990-PF 501(c)(3) exempt private foundation 4947(a)(1) nonexempt charitable trust treated as a private foundation 501(c)(3) taxable private foundation Check if your organization is covered by the General Rule or a Special Rule. Note: Only a section 501(c)(7), (8), or (10) organization can check boxes for both the General Rule and a Special Rule. See instructions. **General Rule** For an organization filing Form 990, 990-EZ, or 990-PF that received, during the year, contributions totaling \$5,000 or more (in money or property) from any one contributor. Complete Parts I and II. See instructions for determining a contributor's total contributions. **Special Rules** |X| For an organization described in section 501(c)(3) filing Form 990 or 990-EZ that met the 33¹/₃% support test of the regulations under sections 509(a)(1) and 170(b)(1)(A)(vi), that checked Schedule A (Form 990 or 990-EZ). Part II. line 13, 16a, or 16b, and that received from any one contributor, during the year, total contributions of the greater of (1) \$5,000; or (2) 2% of the amount on (i) Form 990, Part VIII, line 1h; or (ii) Form 990-EZ, line 1. Complete Parts I and II. For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, total contributions of more than \$1,000 exclusively for religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals. Complete Parts I (entering "N/A" in column (b) instead of the contributor name and address), II, and III. For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, contributions exclusively for religious, charitable, etc., purposes, but no such contributions totaled more than \$1,000. If this box is checked, enter here the total contributions that were received during the year for an exclusively religious, charitable, etc., purpose. Don't complete any of the parts unless the General Rule applies to this organization because it received nonexclusively religious, charitable, etc., contributions totaling \$5,000 or more during the year Caution: An organization that isn't covered by the General Rule and/or the Special Rules doesn't file Schedule B (Form 990,

990-EZ, or 990-PF), but it **must** answer "No" on Part IV, line 2, of its Form 990; or check the box on line H of its Form 990-EZ or on its Form 990-PF, Part I, line 2, to certify that it doesn't meet the filing requirements of Schedule B (Form 990, 990-EZ, or 990-PF).

For Paperwork Reduction Act Notice, see the instructions for Form 990, 990-EZ, or 990-PF.

Schedule B (Form 990, 990-EZ, or 990-PF) (2019)

Page 2

Schedule B (Form 990, 990-EZ, or 990-PF) (2019)

Name of organization

Henry County Community Foundation,

Employer identification number 31-1170412

Part I	Contributors (see instructions). Use duplicate copies of	Part I if additional space i	s needed.
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
1	Douglas & Myrna Reeves 2228 Heather Glen Way Franklin IN 46131	\$ 121,720	Person X Payroll Noncash X (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
2	Jameson McGrew 2820 S Memorial Dr Apt 212 New Castle IN 47362	\$ 100,000	Person X Payroll Noncash (Complete Part II for noncash contributions.)
(a)	(b)	(c)	(d)
No. 3	Name, address, and ZIP + 4 Estate of Paul and Marian Prior 529 Edgewood Dr New Castle IN 47362	Total contributions \$ 1,950,000	Person X Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
4	Estate of Nancy Antrim 1601 Cornwall Rd Lebanon PA 17042	\$ 78,118	Person X Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	Person Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	Person Payroll Noncash (Complete Part II for noncash contributions.)

Name of organization

Employer identification number

Henry County Community Foundation,

31-1170412

Part II	Noncash Property (see instructions). Use duplications	ate copies of Part II iI addition	ai space is needed.
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
1	Public Securities		
· 		\$ 121,620	11/25/19
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		\$	

Department of the Treasury Internal Revenue Service

Supplemental Financial Statements

► Complete if the organization answered "Yes" on Form 990, Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b. ► Attach to Form 990.

► Go to www.irs.gov/Form990 for instructions and the latest information.

2019
Open to Public Inspection

Name of the organization Employer identification number Henry County Community Foundation, Inc. 31-1170412 Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts. Part I Complete if the organization answered "Yes" on Form 990, Part IV, line 6. (a) Donor advised funds (b) Funds and other accounts Total number at end of year 20 166,333 Aggregate value of contributions to (during year) 2 Aggregate value of grants from (during year) 149,428 3 Aggregate value at end of year _____ [1,770,158 4 Did the organization inform all donors and donor advisors in writing that the assets held in donor advised funds are the organization's property, subject to the organization's exclusive legal control? Did the organization inform all grantees, donors, and donor advisors in writing that grant funds can be used only for charitable purposes and not for the benefit of the donor or donor advisor, or for any other purpose conferring impermissible private benefit? Part II **Conservation Easements.** Complete if the organization answered "Yes" on Form 990, Part IV, line 7. Purpose(s) of conservation easements held by the organization (check all that apply). Preservation of land for public use (for example, recreation or education Preservation of a historically important land area Protection of natural habitat Preservation of a certified historic structure Preservation of open space Complete lines 2a through 2d if the organization held a qualified conservation contribution in the form of a conservation easement on the last day of the tax year. Held at the End of the Tax Year a Total number of conservation easements 2a **b** Total acreage restricted by conservation easements c Number of conservation easements on a certified historic structure included in (a) 2c d Number of conservation easements included in (c) acquired after 7/25/06, and not on a historic structure listed in the National Register Number of conservation easements modified, transferred, released, extinguished, or terminated by the organization during the Number of states where property subject to conservation easement is located ▶ Does the organization have a written policy regarding the periodic monitoring, inspection, handling of violations, and enforcement of the conservation easements it holds? Staff and volunteer hours devoted to monitoring, inspecting, handling of violations, and enforcing conservation easements during the year 6 Amount of expenses incurred in monitoring, inspecting, handling of violations, and enforcing conservation easements during the year Does each conservation easement reported on line 2(d) above satisfy the requirements of section 170(h)(4)(B)(i) and section 170(h)(4)(B)(ii)? In Part XIII, describe how the organization reports conservation easements in its revenue and expense statement and balance sheet, and include, if applicable, the text of the footnote to the organization's financial statements that describes the organization's accounting for conservation easements. Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets. Complete if the organization answered "Yes" on Form 990, Part IV, line 8. 1a If the organization elected, as permitted under FASB ASC 958, not to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide in Part XIII the text of the footnote to its financial statements that describes these items. b If the organization elected, as permitted under FASB ASC 958, to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide the following amounts relating to these items: (i) Revenue included on Form 990, Part VIII, line 1 (ii) Assets included in Form 990, Part X 2 If the organization received or held works of art, historical treasures, or other similar assets for financial gain, provide the following amounts required to be reported under FASB ASC 958 relating to these items: a Revenue included on Form 990, Part VIII, line 1 Assets included in Form 990, Part X.

The percentages on lines 2a, 2b, and 2c should equal 100%.

3a Are there endowment funds not in the possession of the organization that are held and administered for the organization by:

(i) Unrelated organizations
(ii) Related organizations

b If "Yes" on line 3a(ii), are the related organizations listed as required on Schedule R?
 Describe in Part XIII the intended uses of the organization's endowment funds.

Part VI	Land. l	Buildinas.	and I	Equipment	t
---------	---------	------------	-------	-----------	---

Complete if the organization answered "Yes" on Form 990, Part IV, line 11a. See Form 990, Part X, line 10.

Description of property	(a) Cost or other basis	(b) Cost or other basis	(c) Accumulated	(d) Book value
	(investment)	(other)	depreciation	
1a Land		152,514		152,514
b Buildings		452,855	200,487	252,368
c Leasehold improvements				
d Equipment		143,352	107,578	35,774
e Other				
Total. Add lines 1a through 1e. (Column (d) must	egual Form 990. Part X.	column (B), line 10c.)	•	440,656

Schedule D (Form 990) 2019

Yes

3a(i)

3a(ii)

No

X

Х

Schedule D (Form 990) 2019 Henry County Community Foundation, 31-1170412

Part VII	Investments – Other Securities. Complete if the organization answered "Yes" or	n Form 990 Part IV	line 11b See Form 990) Part X line 12
	(a) Description of security or category	(b) Book value	(c) Method of val	
	(including name of security)		Cost or end-of-year m	arket value
(1) Financial	derivatives			
	eld equity interests			
(B)				
(C) (D)				
(E)				
(F)				
(G)				
(H)				
Total. (Colum	nn (b) must equal Form 990, Part X, col. (B) line 12.)			
Part VIII	Investments – Program Related.			
	Complete if the organization answered "Yes" o	n Form 990, Part IV,	line 11c. See Form 990	, Part X, line 13.
	(a) Description of investment	(b) Book value	(c) Method of val	
			Cost or end-of-year m	arket value
(1)				
(2)				
(3)				
(4) (5)				
(6)				
(7)				
(8)				
(9)				
Total. (Colum	nn (b) must equal Form 990, Part X, col. (B) line 13.) ▶			
Part IX	Other Assets.			
	Complete if the organization answered "Yes" o	n Form 990, Part IV,	, line 11d. See Form 990	
	(a) Description			(b) Book value
(1)				
(2)				
(3)				
(4) (5)				
(6)				
(7)				
(8)				
(9)				
Total. (Colum	nn (b) must equal Form 990, Part X, col. (B) line 15.)		>	
Part X	Other Liabilities.			
	Complete if the organization answered "Yes" o	n Form 990, Part IV,	, line 11e or 11f. See Fo	rm 990, Part X,
	line 25.			
1.	(a) Description of liability			(b) Book value
_ \ /	income taxes			600 105
	ity Reserves			600,185
	cy Funds tal Lease			307,151
_ ` '	Cal Hease			11,686
(5) (6)				
(7)				
(8)				
(9)				
	nn (b) must equal Form 990, Part X, col. (B) line 25.)		•	919,022
	uncertain tax positions. In Part XIII, provide the text of the fo	otnote to the organization	n's financial statements that re	

organization's liability for uncertain tax positions under FASB ASC 740. Check here if the text of the footnote has been provided in Part XIII

1	Complete if the organization answered "Yes" on Form 99 Total revenue, gains, and other support per audited financial statements			1	9,329,931
2	Amounts included on line 1 but not on Form 990, Part VIII, line 12:			•	J/32J/J31
	Net unrealized gains (losses) on investments	2a	5,260,622		
b	Donated services and use of facilities	2b	3/200/022		
C	Recoveries of prior year grants	2c			
d	Recoveries of prior year grants Other (Describe in Part XIII.)	2d	-96,884		
	Add lines 2a through 2d		•	2e	5,163,738
3	Subtract line 2e from line 1			3	4,166,193
	Amounts included on Form 990, Part VIII, line 12, but not on line 1:				
	Investment expenses not included on Form 990, Part VIII, line 7b	4a	230,847		
	Other (Describe in Part XIII.)		50,334		
	Add lines As and Ab		-	4c	281,181
	Total revenue. Add lines 3 and 4c. (<i>This must equal Form 990, Part I, line 12.</i>)			5	4,447,374
	rt XII Reconciliation of Expenses per Audited Financial St			er Re	
	Complete if the organization answered "Yes" on Form 9				
1	Total arrange and leave was audited financial statements	·	.,	1	2,468,657
2	Amounts included on line 1 but not on Form 990, Part IX, line 25:			_	
	Donated services and use of facilities	2a			
b	Prior year adjustments	2b			
c	Other losses	2c			
d	Other (Describe in Part XIII.)	2d			
е	Add lines 2a through 2d			2e	
3	Subtract line 2e from line 1			3	2,468,657
4	Amounts included on Form 990, Part IX, line 25, but not on line 1:]]			-
	Investment expenses not included on Form 990, Part VIII, line 7b	4a	230,847		
	Other (Describe in Part XIII.)		13,333		
	Add lines 4a and 4b		-	4c	244,180
	Total expenses. Add lines 3 and 4c. (This must equal Form 990, Part I, line 18.)			5	2,712,837
	rt XIII Supplemental Information.				•
	de the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and 4; F	Part IV, lines	1b and 2b; Part V, line	4; Par	t X, line
	rt XI, lines 2d and 4b; and Part XII, lines 2d and 4b. Also complete this part to pro			•	•
	art V, Line 4 - Intended Uses for Endown				
Tł	ne Foundation's endowment funds are inte	ended t	to award gra	ants	for
					
cl	naritable, educational or scientific pro	ojects	and purpose	es.	Permanent
	······································	7	····· · ····		
eı	ndowment funds are intended to award cha	aritab	le grants i	n pe	rpetuity.
				· · · · · · · · · · ·	
Pa	art X - FIN 48 Footnote				
Pa	art X - FIN 48 Footnote				

The Foundation recognizes a tax benefit only if it is more likely than not the tax position would be sustained in a tax examination, with a tax examination being presumed to occur. The amount recognized will be the largest amount of tax benefit that is greater than 50% likely of being realized on examination. For tax positions not meeting the more-likely-than-not test, no tax benefit will be recorded. The Foundation has examined

Part XIII Supplemental Information (continued) this issue and has determined there are no material contingent tax liabilities. The Foundation's federal and state exempt organization tax returns for 2016, 2017, and 2018 are subject to examination by the Internal Revenue Service and the Indiana Department of Revenue. Returns are generally subject to examination for three years after they are filed. Part XI, Line 2d - Revenue Amounts Included in Financials - Other Change in value of split interest agreement \$ -96,884 Part XI, Line 4b - Revenue Amounts Included on Return - Other Agency Fund Revenue \$ 50,334 Part XII, Line 4b - Expense Amounts Included on Return - Other Agency Fund Expenses \$ 13,333

Grants and Other Assistance to Organizations, Governments, and Individuals in the United States

Complete if the organization answered "Yes" on Form 990, Part IV, line 21 or 22.

► Attach to Form 990.

► Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047 **2019**

Open to Public Inspection

Department of the Treasury Internal Revenue Service

Name of the organization

Henry County Community Foundation,

Employer identification number 31-1170412

						X Yes No
Domestic Orga	anizatio	ns and Domestic	Governments.	Complete if the	e organizatior	answered "Yes" on Form 99
(b) EIN	section	` '	` '	(f) Method of valuation (book, FMV, appraisal,	10,	(h) Purpose of grant or assistance
	(п аррпсавіе)	grant	00311 03313101100	ouier)	Horicusti ussistance	or assistance
						Operating Support
83-2581465	501c3	9,907				3
		-				
						Operating support
35-1339579		14,597				
•						
						Operating support
35-1632891	501c3	30,205				
						Operating support
52-1041241	501c3	13,815				
						Operating support
45-3458241	GOV	19,070				
						Operating support
23-7118666	GOV	12,000				
						Operating support
35-1061264	501c3	6,000				
						Shelter program
35-1684808	501c3	11,972				
						Parks
· ·						
•						
	ssistance? or monitoring the use o Domestic Orga that received mo (b) EIN 83-2581465 35-1339579 35-1632891 52-1041241 45-3458241 23-7118666 3t 35-1061264 35-1684808 35-6001134 ment organizations lis	ssistance? or monitoring the use of grant furity of Domestic Organization that received more than \$\frac{1}{3}\$ (b) EIN (c) IRC section (if applicable) 83-2581465 501c3 35-1339579 35-1632891 501c3 45-3458241 GOV 23-7118666 GOV 3t 35-1061264 501c3 35-1684808 501c3 35-6001134 GOV ment organizations listed in the	sistance? or monitoring the use of grant funds in the United State of Domestic Organizations and Domestic that received more than \$5,000. Part II can (b) EIN (c) IRC section (ff applicable) (d) Amount of cash grant (d) Am	ssistance? or monitoring the use of grant funds in the United States. o Domestic Organizations and Domestic Governments. that received more than \$5,000. Part II can be duplicated i (b) EIN (c) IRC section (ff applicable) (d) Amount of cash grant (e) Amount of non-cash assistance (e) Amount of non-cash assistance (from the cash a	ssistance? or monitoring the use of grant funds in the United States. o Domestic Organizations and Domestic Governments. Complete if the that received more than \$5,000. Part II can be duplicated if additional spa (b) EIN (c) IRC section (d) Amount of cash grant (e) Amount of non-cash assistance (frapplicable) (if applicable) (if applicable) (a) Amount of cash grant (b) Method of valuation (b) Method of valuat	or monitoring the use of grant funds in the United States. o Domestic Organizations and Domestic Governments. Complete if the organization that received more than \$5,000. Part II can be duplicated if additional space is needed. (b) EIN (C) IRC (section (flappicable) (d) Amount of cash (e) Amount of non-cash assistance (d) EIN (d) EIN (d) EIN (e) Amount of non-cash assistance (e) Amount of non-cash assistance (d) EIN (d) EIN (e) Amount of non-cash assistance (d) EIN (e) EIN (e) Amount of non-cash assistance (d) EIN (e) EIN (e) Amount of non-cash assistance (d) EIN (e) EIN (e) Amount of non-cash assistance (d) EIN (e) EIN

Grants and Other Assistance to Organizations, Governments, and Individuals in the United States

Complete if the organization answered "Yes" on Form 990, Part IV, line 21 or 22.

► Attach to Form 990.

► Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047 **2019**

Open to Public Inspection

Department of the Treasury Internal Revenue Service

Name of the organization

Henry County Community Foundation,

Employer identification number 31-1170412

Part I General Information on Grants ar	nd Assistance					
 Does the organization maintain records to substantiate the selection criteria used to award the grants or assis Describe in Part IV the organization's procedures for records. 	tance?					Yes No
Part II Grants and Other Assistance to I	Omestic Organizat	ons and Domestic	Governments.	Complete if the	e organization	answered "Yes" on Form 990
Part IV, line 21, for any recipient that						
1 (a) Name and address of organization or government	(b) EIN (c) IRC section (if applical	(d) Amount of cash	(e) Amount of non- cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of noncash assistance	(h) Purpose of grant or assistance
(1) Emergency First Aid Unit				,		
1315 I Avenue New Castle IN 47362	35-6001134 GOV	13,062				Operating support
(2) First Friends Meeting 503 S Main St						Operating support
	35-6023855	14,272				
(3) First Presbyterian Church PO Box 491						Operating support
New Castle IN 47362		6,723				
(4) First United Methodist Church 1324 Church St						Designated distrib.
	35-0933547	28,974				
(5) Grace United Methodist 1300 E Adams Dr						Operating support
	35-1041916 501c	3 60,000				
(6) Healthy Communities of Henry Cour PO Box 921						Trail Development
	35-1887164 501c	3 7,019				
(7) Henry County Expo Center PO Box 137 New Castle IN 47362	82-4581011 501c	266 524				Building project
	02-4501011 5010	3 266,534				
(8) Henry County Heart Society 1000 N 16th St						Operating guarant
New Castle IN 47362	35-1405253 501c	3 14,652				Operating support
(9) Henry County Hospital Foundation 1000 N 16th St New Castle IN 47362	35-6042246 501c	3 16,063				Operating support
	l l					
2 Enter total number of section 501(c)(3) and governme	nt organizations listed in t	ne line 1 table				
3 Enter total number of other organizations listed in the	line 1 table					▶

Department of the Treasury

Internal Revenue Service

Name of the organization

Grants and Other Assistance to Organizations, Governments, and Individuals in the United States

Complete if the organization answered "Yes" on Form 990, Part IV, line 21 or 22.

► Attach to Form 990.

Henry County Community Foundation,

► Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047 **2019**

Open to Public Inspection

Employer identification number

31-1170412 Inc. Part I **General Information on Grants and Assistance** 1 Does the organization maintain records to substantiate the amount of the grants or assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance? No Describe in Part IV the organization's procedures for monitoring the use of grant funds in the United States. Grants and Other Assistance to Domestic Organizations and Domestic Governments. Complete if the organization answered "Yes" on Form 990, Part II Part IV, line 21, for any recipient that received more than \$5,000. Part II can be duplicated if additional space is needed. (a) Name and address of organization (c) IRC (f) Method of valuation (d) Amount of cash (e) Amount of non-(h) Purpose of grant (b) EIN (a) Description of book, FMV, appraisal, cash assistance or government grant or assistance noncash assistance other) if applicable) (1) Henry County YMCA 300 Wittenbraker Ave Recreation/Oper. New Castle IN 47362 35-0873347 501c3 37,327 (2) Honey Creek United Methodist Church PO Box 39 Operating support Middletown IN 47356 35-1699711 17,342 (3) Hoosier Gym Community Center 355 N Washington St Operating support 35-1891029 501c3 12,125 Knightstown IN 46148 (4) Hope Initiative 1415 Alabama St Video production New Castle 27-0668407 501c3 6,927 IN 47362 (5) Interlocal CAP PO Box 449 Designated Dist. New Castle 35-1116629 501c3 31,782 IN 47362 (6) Knightstown Alumni Association PO Box 121 Designated distrib. Knightstown IN 46148 35-1657537 509a1 32,000 (7) Little Red Door Cancer Agency 2311 W. Jackson St Operating support Muncie IN 47303 35-0914096| 501c3 5,157 (8) Middletown Parks' Board 653 Locust St Trail Bridge Project Middletown 35-6001110 GOV IN 47356 10,000 (9) Mooreland Fire Dept PO Box 184 Operating support Mooreland IN 47360 35-1451425 GOV 6,859 2 Enter total number of section 501(c)(3) and government organizations listed in the line 1 table

3 Enter total number of other organizations listed in the line 1 table

Grants and Other Assistance to Organizations, Governments, and Individuals in the United States

Complete if the organization answered "Yes" on Form 990, Part IV, line 21 or 22.

► Attach to Form 990.

► Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047 **2019**

Open to Public Inspection

Department of the Treasury Internal Revenue Service

Name of the organization

Henry County Community Foundation, Inc.

Employer identification number 31-1170412

Part I General Inform	nation on Grants ar	nd Assistance)					
Does the organization mainta the selection criteria used to	award the grants or assis	stance?				•		Yes No
2 Describe in Part IV the organ Part II Grants and Ot						Complete if the	o organization	n answered "Yes" on Form 990
	, for any recipient th							
1 (a) Name and address or government	of organization	(b) EIN	(c) IRC section	(d) Amount of cash grant	(e) Amount of non- cash assistance	(f) Method of valuation (book, FMV, appraisal, other)		(h) Purpose of grant or assistance
(1) Mooreland Free Fai			(if applicable)	grant	Cash assistance	otner)	HOHCASH ASSISTANCE	Of desistance
8043 E CR 450 N	I, IIIC				1			Fencing
Mooreland	IN 47360	31-0966264		7,000	1			reneing
(2) New Castle Communi		31-0300201		7,000	- <u></u> 			
322 Elliott Ave	cy beneer corp				1			Maintenance
New Castle	IN 47362	35-6002688	GOV	69,551	1			Harmeenanee
(3) New Castle F & AM		33 3332333		03/332				
PO Box 381					1			Operating support
New Castle	IN 47362	61-1504723	501c8	14,124	1			operating support
(4) New Castle Main St								
1090 W CR 100 S					1			Operating support
New Castle	IN 47362	47-2371890		15,350	1			
(5) New Castle-Henry C	ounty Public			-				
PO Box J 376 S 15t					1			Designated Dist.
New Castle	IN 47362	35-6001959	501c3	21,078	I			
(6) New Castle Little	League							
2800 Lakeview Dr					I			Operating support
New Castle	IN 47362	35-6044091	501c3	15,000	I			
(7) New Castle Henry C	ounty EDC							
100 S Main St					I			Tourism research
New Castle	IN 47362	35-6000155	GOV	8,000	1			
(8) Salvation Army								
PO Box 571					1			Operating support
New Castle	IN 47362	35-0868167	501c3	5,543	<u> </u>			
(9) Second Harvest Foo	d Bank of							
6621 N Old SR 3					I			Operating support
Muncie	IN 47303	31-1111795	510c3	27,223	<u>I</u>			
2 Enter total number of section	501(c)(3) and governme	nt organizations li	sted in the	line 1 table				•
3 Enter total number of other o	rganizations listed in the	line 1 table						

Grants and Other Assistance to Organizations, Governments, and Individuals in the United States

Complete if the organization answered "Yes" on Form 990, Part IV, line 21 or 22.

► Attach to Form 990.

 \blacktriangleright Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047 **2019**

Open to Public Inspection

Department of the Treasury Internal Revenue Service

Name of the organization

Henry County Community Foundation,

Employer identification number 31-1170412

Part I General Information on Grants ar	nd Assistance						
 Does the organization maintain records to substantiat the selection criteria used to award the grants or assis Describe in Part IV the organization's procedures for I 	te the amount of the stance?	e grants or	assistance, the grant	ees' eligibility for the	e grants or assistan	ice, and	Yes No
Part II Grants and Other Assistance to I	Domestic Ora	nizatior	ns and Domestic	Governments	Complete if the	organization	answered "Yes" on Form 990
Part IV, line 21, for any recipient that							ranswered res entrenn eet
1 (a) Name and address of organization or government	(b) EIN	(c) IRC section (if applicable)	(d) Amount of cash grant	(e) Amount of non- cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of noncash assistance	(h) Purpose of grant or assistance
(1) Secret Families of Henry Co PO Box 12							Christmas Season
Mt Summit IN 47361	27-1126773	501c3	5,620				
(2) Spiceland Preservation and Touris PO Box 453 Spiceland IN 47385	sm 38-2022394	501c3	10,502				Designated distrib.
(3) Town of Spiceland PO Box 386							Designated distrib.
Spiceland IN 47385	35-6001205	GOV	5,383				
(4) Westminster Community Center 2600 C Ave	25 1046816	E01 - 2	c co2				Operating support
New Castle IN 47362	35-1046716	20TG3	6,683				
(5) Wilbur Wright Birthplace 1525 N CR 750 East							Operating support
Hagerstown IN 47346	35-1882766	501c3	13,922				
(6) Young Life of Henry County 2805 Hillcrest Dr New Castle IN 47362	84-0385934	501c3	13,939				Operating support
(7)							
(8)							
(9)							
 2 Enter total number of section 501(c)(3) and governme 3 Enter total number of other organizations listed in the 	_	sted in the	line 1 table				

Schedule I (Form 990) (2019) Henry Cou	nty Community E	Coundation, 3	1-1170412	L"X/ " E 000	Page 2
Part III Grants and Other Assista Part III can be duplicated if			ne organization ans	wered "Yes" on Form 990), Part IV, line 22.
(a) Type of grant or assistance	(b) Number of recipients	(c) Amount of cash grant	(d) Amount of noncash assistance	(e) Method of valuation (book, FMV, appraisal, other)	(f) Description of noncash assistance
1 Scholarships	59	398,825			
2					
3					
4					
5					
6					
7 Part IV Supplemental Information	Provide the information	required in Port I. I	ing 2: Part III. calur	nn (h); and any other addi	itional information
See Schedule I Suppleme			ine 2, Fait III, Colui	iiii (b), and any other addi	ilionai iniomialion.
see schedule i suppleme	ncar informacio	ii worksheet			

SCHEDULE I	Supplemental Informa	2019		
(Form 990)	For calendar year 2019, or tax year beginning	, and ending	2013	
Name of the organization	Henry County Community Foundation,		Employer identification number	
	Inc.		31-1170412	

Part I, Line 2 - Procedures for Monitoring the Use of Grant Funds
The grant application process starts with a workshop that must be attended
by one person from each organization or agency applying for a grant. This
is followed by a grant application process. After the grant applications
are received, they are turned over to a member of the grants committee who
does a site visit to see the organization and/or program and to speak to
the person in charge as to the grant. This committee member then meets with
the total grant committee and makes recommedations for the grant or reasons
the grant is not worthy of recommendation. The committee then votes and
those recommendations are taken to the Board of Directors for final
approval.

Noncash Contributions

OMB No. 1545-0047

Open To Public Inspection

Department of the Treasury Internal Revenue Service Name of the organization

Complete if the organizations answered "Yes" on Form 990, Part IV, lines 29 or 30.

Attach to Form 990.

► Go to www.irs.gov/Form990 for instructions and the latest information.

Henry County Community Foundation, Inc.

Employer identification number 31-1170412

Part I Types of Property (c) (a) (d) Noncash contribution Check if Number of contributions or Method of determining amounts reported on applicable items contributed noncash contribution amounts Form 990, Part VIII, line 1q 1 Art — Works of art Art — Historical treasures 2 Art — Fractional interests 3 Books and publications 4 5 Clothing and household goods Cars and other vehicles 6 7 Boats and planes Intellectual property 8 Securities — Publicly traded 122,639 Avg high/low date of gift 9 10 Securities — Closely held stock Securities — Partnership, LLC, 11 or trust interests Securities — Miscellaneous 12 13 Qualified conservation contribution — Historic structures Qualified conservation 14 contribution — Other Real estate — Residential 15 Real estate — Commercial 16 Real estate — Other 17 Collectibles 18 Food inventory 19 Drugs and medical supplies 20 Taxidermy 21 Historical artifacts 22 Scientific specimens 23 Archeological artifacts 24 Other ►(25 26 Other ►(.) 27 Other ▶(.) 28 Other ►(Number of Forms 8283 received by the organization during the tax year for contributions for 29 which the organization completed Form 8283, Part IV, Donee Acknowledgement 29 Yes No 30a During the year, did the organization receive by contribution any property reported in Part I, lines 1 through 28, that it must hold for at least three years from the date of the initial contribution, and which isn't required to be used for exempt purposes for the entire holding period? X 30a **b** If "Yes," describe the arrangement in Part II. Does the organization have a gift acceptance policy that requires the review of any nonstandard Х 31 32a Does the organization hire or use third parties or related organizations to solicit, process, or sell noncash Х 32a If "Yes," describe in Part II.

If the organization didn't report an amount in column (c) for a type of property for which column (a) is checked,

describe in Part II.

Part II	Supplemental Information. Provide the information required by Part I, lines 30b, 32b, and 33, and whether the organization is reporting in Part I, column (b), the number of contributions, the number of items received, or a combination of both. Also complete this part for any additional information.

SCHEDULE O (Form 990 or 990-EZ)

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information.

OMB No. 1545-0047 2019

Department of the Treasury Internal Revenue Service

► Attach to Form 990 or 990-EZ. ► Go to www.irs.gov/Form990 for the latest information.

Open to Public Inspection

Name of the organization Henry County Community Foundation, 31-1170412

Employer identification number

Form 990 - Organization's Mission The Henry County Community Foundation, Inc. is a public trust which secures permanent funds for philanthropic purposes. Its mission is to help where the needs are greatest and benefits to the community and its citizens are most substantial; to provide public spirited donors a vehicle for using their gifts in the best possible way now and in the future as conditions inevitably change; and to provide excellent stewardship of those gifts which it receives.

Form 990, Part III, Line 4d - All Other Accomplishments Other miscellaneous program services funded by the Foundation during 2019.

Form 990, Part VI, Line 11b - Organization's Process to Review Form 990 Audited financial statements are reviewed with the governing board and the auditor. The Form 990 is reviewed by the Executive Director and the accountant.

Form 990, Part VI, Line 12c - Enforcement of Conflicts Policy The Foundation monitors and enforces compliance at monthly board meetings as part of the agenda.

Form 990, Part VI, Line 15a - Compensation Process for Top Official The process for determining compensation of the Executive Director is governed and approved by the Board of Directors on an annual basis. The Executive Director performs the review for all other Foundation personnel

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

Attachment

Sequence No. 128

	art I U.S. Transferor Information (see instructions)			
	ne of transferor	Identifying number	(see instr	ructions)
	enry County Community Foundation,			
I	nc.	31-1170412	2	
1	Is the transferee a specified 10%-owned foreign corporation that is no	a controlled foreign corporation?	Yes	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 of	ontrolled (under section 368(c)) by	_	_
			Yes	No
b			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 consolidat	-	_	
	corporation?		Yes	No
	If not, list the name and employer identification number (EIN) of the pa	rent corporation.		
	Name of parent corporation	EIN of parent corporation		
	to the property of the contract of the contrac			
		LIN OF PAIGHT CORPORATION		
		LIN OF PAREIT CORPORATION		
4	Hove been adjustments under section 267/a\/4\ been made?		Vac	□ No.
d	Have basis adjustments under section 367(a)(4) been made?	LIN OF PATERIC COSPORATION	Yes	☐ No
d 3	If the transferor was a partner in a partnership that was the actual tran		Yes	☐ No
3	If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d.		Yes	□ No
3	If the transferor was a partner in a partnership that was the actual tran		Yes	☐ No
3	If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	sferor (but is not treated as such under section 367),	Yes	□ No
3	If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d.		Yes	No
3 a	If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership	sferor (but is not treated as such under section 367), EIN of partnership	Yes	□ No
3 a	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP	sferor (but is not treated as such under section 367), EIN of partnership 45-1677879		
3 a	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of partnership.	sferor (but is not treated as such under section 367), EIN of partnership 45-1677879	Yes	X No
3 a b c	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles is the partner disposing of its entire interest in the partnership?	sferor (but is not treated as such under section 367), EIN of partnership 45-1677879 nership assets?		
3 a b c	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles is the partner disposing of its entire interest in the partnership? I is the partner disposing of an interest in a limited partnership that is re	sferor (but is not treated as such under section 367), EIN of partnership 45-1677879 nership assets?	Yes Yes	X No X No
3 a b c	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles is the partner disposing of its entire interest in the partnership? I is the partner disposing of an interest in a limited partnership that is resecurities market?	sferor (but is not treated as such under section 367), EIN of partnership 45-1677879 nership assets? gularly traded on an established	Yes	X No
3 a b c d	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles is the partner disposing of its entire interest in the partnership? I is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (sferor (but is not treated as such under section 367), EIN of partnership 45-1677879 nership assets? gularly traded on an established see instructions)	Yes Yes Yes	X No X No X No
3 a b c	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles is the partner disposing of its entire interest in the partnership? I is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation)	sferor (but is not treated as such under section 367), EIN of partnership 45-1677879 nership assets? gularly traded on an established see instructions) 5a Identifying number	Yes Yes Yes	X No X No X No
3 a b c d	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles the partner disposing of its entire interest in the partnership? I is the partner disposing of an interest in a limited partnership that is resecurities market? art II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Symend Holdings Corp	sferor (but is not treated as such under section 367), EIN of partnership 45-1677879 nership assets? gularly traded on an established see instructions) 5a Identifying number 83-459056	Yes Yes Yes er, if any	X No X No X No
3 a b c d	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles is the partner disposing of its entire interest in the partnership? I is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation)	EIN of partnership 45-1677879 nership assets? gularly traded on an established see instructions) 5a Identifying number 83-459056 5b Reference ID number	Yes Yes Yes er, if any	X No X No X No
3 a b c d	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles the partner disposing of its entire interest in the partnership? I is the partner disposing of an interest in a limited partnership that is resecurities market? art II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Symend Holdings Corp	sferor (but is not treated as such under section 367), EIN of partnership 45-1677879 nership assets? gularly traded on an established see instructions) 5a Identifying number 83-459056	Yes Yes Yes er, if any	X No X No X No
3 a b c d	If the transferor was a partner in a partnership that was the actual trancomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles is the partner disposing of its entire interest in the partnership? I is the partner disposing of an interest in a limited partnership that is resecurities market? art II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Symend Holdings Corp Address (including country)	EIN of partnership 45–1677879 nership assets? gularly traded on an established see instructions) 5a Identifying numbe 83–459056 5b Reference ID numbe (see instructions)	Yes Yes Yes er, if any	X No X No X No
3 a b c d	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles the partner disposing of its entire interest in the partnership? I is the partner disposing of an interest in a limited partnership that is resecurities market? art II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Symend Holdings Corp	EIN of partnership 45–1677879 nership assets? gularly traded on an established see instructions) 5a Identifying numbe 83–459056 5b Reference ID numbe (see instructions)	Yes Yes Yes er, if any	X No X No X No
3 a b c d d P 6 7	If the transferor was a partner in a partnership that was the actual trancomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? art II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Symend Holdings Corp Address (including country) Country code of country of incorporation or organization (see instruction)	EIN of partnership 45–1677879 nership assets? gularly traded on an established see instructions) 5a Identifying numbe 83–459056 5b Reference ID numbe (see instructions)	Yes Yes Yes er, if any	X No X No X No
3 a b c d	If the transferor was a partner in a partnership that was the actual trancomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? art II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Symend Holdings Corp Address (including country) Country code of country of incorporation or organization (see instruction) Foreign law characterization (see instructions)	EIN of partnership 45–1677879 nership assets? gularly traded on an established see instructions) 5a Identifying numbe 83–459056 5b Reference ID numbe (see instructions)	Yes Yes Yes er, if any	X No X No X No
3 a b c d d P 6 7	If the transferor was a partner in a partnership that was the actual trancomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP Did the partner pick up its pro rata share of gain on the transfer of particles the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? art II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Symend Holdings Corp Address (including country) Country code of country of incorporation or organization (see instruction)	EIN of partnership 45-1677879 nership assets? gularly traded on an established see instructions) 5a Identifying number 83-459056 5b Reference ID number (see instructions)	Yes Yes Yes er, if any	X No X No X No

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	ation Regard	ding Transfer of Property (see	instructi	ons)			
Section A—Cash	(a)	(h)	1	(a)	(4)	1 /-	
Type of property	(a) Date of transfer	(b) Description of property		(c) Fair market value on date of transfer	(d) Cost or other basis	Gain reco	gnized on
Cash	12/31/19			2,111	Bacio	tran	0101
	emainder of Part	erred? t III and go to Part IV. than intangible property subject		on 367(d))		X Yes	☐ No
Type of	(a)	(b)	io sectiv	(c)	(d)	(e	<u>:)</u>
property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain reco	gnized on
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with built-in loss							
Totals							
(including a branch If "Yes," continue to c Immediately after t transferee foreign of If "Yes," continue to d Enter the transferre	12b. a domestic corp that is a foreign o line 12c. If "No he transfer, was corporation? o line 12d. If "No ed loss amount transfer property	o," skip line 12d, and go to line 13. included in gross income as required un described in section 367(d)(4)?	of the as -owned fo 13. nolder wit	ssets of a foreign brai preign corporation? h respect to the	······	Yes Yes Yes	No No No No
Section C—Intangible	le Property Si	ubject to Section 367(d)					
	(a)	(b)	(c)	(d)	(e)	(f	·)
Type of property	Date of transfer	Description of property	Useful life	Arm's length price on date of transfer	Cost or other basis	Income i for year o	nclusion
Property described in sec. 367(d)(4)							
Totals							

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	Nο

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

Attachment Sequence No. 128

Part I U.S. Transferor Information (see instructions)	
Name of transferor Henry County Community Foundation,	Identifying number (see instructions)
Inc.	31-1170412
	controlled (under section 368(c)) by
b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identifying number(s)	. Yes No
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidat	ed return, was it the parent
corporation?	
in not, list the name and employer identification number (Env) of the pe	iron 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 tran complete questions 3a through 3d.a List the name and EIN of the transferor's partnership.	sferor (but is not treated as such under section 367),
Name of partnership	EIN of partnership
FEG Private Opportunities Fund LP	45-1677879
b Did the partner pick up its pro rata share of gain on the transfer of part	
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 re	
Part II Transferee Foreign Corporation Information (Yes X No
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Megatronics HK Holdco	ou lucitarying number, it arry
6 Address (including country)	5b Reference ID number (see instructions)
7 Country code of country of incorporation or organization (see instruction	ons)
8 Foreign law characterization (see instructions) Corporation	
9 Is the transferee foreign corporation a controlled foreign corporation?	

	ation Regar	ding Transfer of Property (see	instructi	ons)		r age I
Section A—Cash	(2)	(b)		(0)	/d\	(0)
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		o i		12,108		
	emainder of Par	erred? t III and go to Part IV. than intangible property subject				X Yes No
Type of	(a)	(b)		(c)	(d)	(e)
property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	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 of b Was the transferor (including a branch If "Yes," continue to c Immediately after t transferee foreign If "Yes," continue to d Enter the transferor If "No," skip Section	f a foreign bran ?	o," skip line 12d, and go to line 13. included in gross income as required un y described in section 367(d)(4)?ons 14a through 15.	of the as owned for 13. nolder wit	ed entity) transferred sets of a foreign bra preign corporation? h respect to the	to a	Yes No Yes No Yes No Yes No Yes No
Section C—Intangibl	e Property S	ubject to Section 367(d)		T		
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
						1
Totala				1		1

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	Nο

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

Internal Revenue Service U.S. Transferor Information (see instructions) Part I Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? . Part II Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any Puerto Rico Holdings, LLC 98-1446606 5b Reference ID number Address (including country) (see instructions) Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation Is the transferee foreign corporation a controlled foreign corporation? Yes

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	ation Regar	ding Transfer of Property (se	e instructi	ons)			
Section A—Cash	(-)	1		(2)	(4)	1 /2	
Type of property	(a) Date of transfer	(b) Description of property		(c) Fair market value on date of transfer	(d) Cost or other basis	Gain recog	nized on
Cash	01/01/19			3,176	2 40.0		
	emainder of Par	erred? t III and go to Part IV. than intangible property subjec		on 367(d))		∴ X Yes	☐ No
Type of	(a)	(b)		(c)	(d)	(e)
property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recog	
Stock and	a a noron	ргорогчу		date of transfer	basic	tranc	1101
securities							
Inventory							
Other property (not listed under another category)							
Property with							
built-in loss							
Totals							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to c Immediately after t transferee foreign of If "Yes," continue to d Enter the transferre	a domestic corp that is a foreign o line 12c. If "No he transfer, was corporation? o line 12d. If "No ed loss amount ransfer property	o," skip line 12d, and go to line 13. included in gross income as required of described in section 367(d)(4)?	all of the as %-owned fone 13. reholder wit	ssets of a foreign brai preign corporation? h respect to the	nch	Yes Yes Yes	No No No No
Section C—Intangibl	e Property Si	ubject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income ir for year of (see inst	nclusion
Property described in sec. 367(d)(4)							
Totals							

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	Nο

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

Sequence No. 128

Attachment

Part I U.S. Transferor Information (see instructions)	•
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is 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	
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)	Yes No
in not, list the controlling shareholder(s) and their identifying number(s	<i>)</i> .
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolida	Led return, was it the parent
corporation?	
If not, list the name and employer identification number (EIN) of the p	
(=) o	
	·
Name of parent corporation	EIN of parent corporation
Name of parent corporation	EIN of parent corporation
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(4) been made?	Yes No
 d 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 	Yes No
d Have basis adjustments under section 367(a)(4) been made?	Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	Yes No nesferor (but is not treated as such under section 367),
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. 	Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership 	Yes No seferor (but is not treated as such under section 367), EIN of partnership
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP	Yes No insferor (but is not treated as such under section 367), EIN of partnership 45–1677879
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of par	Yes No seferor (but is not treated as such under section 367), EIN of partnership 45-1677879 thership assets? Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of parts the partner disposing of its entire interest in the partnership?	Yes No seferor (but is not treated as such under section 367), EIN of partnership 45-1677879 tnership assets? Yes X No Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of parts the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is re-	EIN of partnership 45–1677879 tnership assets? Yes No Yes X No Yes X No egularly traded on an established
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of parts the partner disposing of its entire interest in the partnership?	Yes No seferor (but is not treated as such under section 367), EIN of partnership 45-1677879 thership assets? Yes X No Yes X No egularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation)	Yes No seferor (but is not treated as such under section 367), EIN of partnership 45-1677879 thership assets? Yes X No Yes X No egularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Tempus Energy LTD	EIN of partnership 45-1677879 tnership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5a Identifying number, if any
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation)	EIN of partnership 45-1677879 tnership assets? Yes X No Yes X No orgularly traded on an established Yes X No (see instructions) 5a Identifying number, if any 5b Reference ID number
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Tempus Energy LTD	EIN of partnership 45-1677879 tnership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5a Identifying number, if any
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Tempus Energy LTD 6 Address (including country)	EIN of partnership 45–1677879 tnership assets? Yes X No Yes X No See instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Tempus Energy LTD	EIN of partnership 45–1677879 tnership assets? Yes X No Yes X No See instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Tempus Energy LTD 6 Address (including country)	EIN of partnership 45–1677879 tnership assets? Yes X No Yes X No See instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Tempus Energy LTD 6 Address (including country)	EIN of partnership 45-1677879 tnership assets? Yes X No Yes X No equilarly traded on an established Yes X No See instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)

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	ation Regar	ding Transfer of Property (see	instructi	ons)			
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	Gain recog	gnized on
Cash	transier	0		3,892	busio	trunc	<u>лог</u>
	emainder of Pa	erred? t III and go to Part IV. than intangible property subject		on 367(d\)		X Yes	☐ No
	(a)	(b)	to section	(c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recog trans	gnized on
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with built-in loss							
Totals						_	
(including a branch of "Yes," continue to transferee foreign of "Yes," continue to the transferre transferre to the tran	12b. r a domestic con h that is a foreig to line 12c. If "N the transfer, wa corporation? to line 12d. If "N ed loss amount transfer propert	rporation that transferred substantially a in disregarded entity) to a specified 10% o," skip lines 12c and 12d, and go to lines the domestic corporation a U.S. share o," skip line 12d, and go to line 13. included in gross income as required uy described in section 367(d)(4)?	ill of the as 6-owned fo e 13. Pholder wit	ssets of a foreign bra preign corporation? h respect to the	<u>.</u>	Yes Yes Yes	No No No
Section C—Intangib	le Property S	ubject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income in for year of (see inst	nclusion
Property described in sec. 367(d)(4)							
						+	
Totals							· <u> </u>

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	Nο

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

Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No **c** Is the partner disposing of its **entire** interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? . Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any Tyrnnex Energy LTD Address (including country) 5b Reference ID number (see instructions) Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation Is the transferee foreign corporation a controlled foreign corporation? Yes

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Part III Inform Section A—Cash	nation Regardi	ing Transfer of Property (see	e instructi	ons)		
Type of property	(a) Date of transfer	(b) Description of		(c) Fair market value on date of transfer	(d) Cost or other	(e) Gain recognized on
Cash	uansiei 0	property		16,540	basis	transfer
	emainder of Part I	ll and go to Part IV.		on 267/d\\		X Yes No
Type of	(a) Date of	nan intangible property subject (b) Description of		(c) Fair market 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						
(including a branc If "Yes," continue c Immediately after transferee foreign If "Yes," continue d Enter the transferor 13 Did the transferor	12b. r a domestic corporation in a domestic corporation? to line 12c. If "No," the transfer, was to corporation? to line 12d. If "No," red loss amount in	skip line 12d, and go to line 13. cluded in gross income as required u described in section 367(d)(4)?	all of the as 6-owned for the 13. The cholder with the cholder with the cholder with the cholder with the cholder sections.	ssets of a foreign brai oreign corporation? th respect to the	······	Yes No Yes No Yes No
Section C—Intangib	le Property Sub	pject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	Nο

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. 1

	or the year of the transfer or distribution. Sequence No. 128
Part I U.S. Transferor Information (see instructions)	I
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	21 1150410
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is not	a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor of	
	Yes No
	Yes No
If not, list the controlling shareholder(s) and their identifying number(s)	
Controlling shougholder	Identify in a name has
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidat	ed return, was it the parent
corporation?	Yes No
If not, list the name and employer identification number (EIN) of the pa	
in not, list the name and employer identification number (Env) of the pa	Tent corporation.
Name of warrant agency and ag	FINI of woman a new condition
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 tran	
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d.	
 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	sferor (but is not treated as such under section 367),
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d.	
 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	sferor (but is not treated as such under section 367),
 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	sferor (but is not treated as such under section 367),
 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership	sferor (but is not treated as such under section 367), EIN of partnership 45-1677879
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP	EIN of partnership 45-1677879
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of partnership.	EIN of partnership 45-1677879 mership assets? Yes X No Yes X No
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 re	EIN of partnership 45-1677879 nership assets? Yes X No yes X No gularly traded on an established
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part c Is the partner disposing of its entire interest in the partnership?	EIN of partnership 45-1677879 nership assets? Yes X No yes X No gularly traded on an established Yes X No
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 re securities market?	EIN of partnership 45-1677879 nership assets? Yes X No yes X No gularly traded on an established Yes X No
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (EIN of partnership 45-1677879 nership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions)
3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (EIN of partnership 45-1677879 nership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions)
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Vesta Energy Corp	EIN of partnership 45-1677879 nership assets? Yes X No Yes X No gularly traded on an established yes X No see instructions) 5a Identifying number, if any
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Vesta Energy Corp	EIN of partnership 45-1677879 nership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5a Identifying number, if any 5b Reference ID number
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Vesta Energy Corp	EIN of partnership 45-1677879 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 re securities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Vesta Energy Corp 6 Address (including country)	EIN of partnership 45-1677879 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 re securities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Vesta Energy Corp 6 Address (including country)	EIN of partnership 45-1677879 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership FEG Private Opportunities Fund LP b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Vesta Energy Corp 6 Address (including country)	EIN of partnership 45-1677879 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)

Form 926 (Rev. 11-2018)		ounty Community Fou		•	0412		Page 2
	ation Regar	<mark>ding Transfer of Property</mark> (see	instructions	s)			
Type of property	(a) Date of transfer	(b) Description of property		(c) market value on ate of transfer	(d) Cost or other basis	(e) Gain recogniz transfer	
Cash	(14,998			
	emainder of Part	t III and go to Part IV.				X Yes	No
•		than intangible property subject	to section		(4)	(0)	
Type of property	(a) Date of transfer	(b) Description of property		(c) market value on ate of transfer	(d) Cost or other basis	(e) Gain recogniz 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 b Was the transferor (including a branch If "Yes," continue to c Immediately after t transferee foreign If "Yes," continue to d Enter the transferor If "No," skip Section	If a foreign brand I? 12b. If a domestic corporation that is a foreign In the transfer, was corporation? In the line 12d. If "Noted loss amount transfer property In C and question?	o," skip line 12d, and go to line 13. included in gross income as required un described in section 367(d)(4)?ns 14a through 15.	Il of the asset o-owned foreig e 13. holder with re	s of a foreign bragn corporation? espect to the	nch	Yes [Yes [Yes [Yes [Yes [Yes [No No No No No
Section C—Intangibi		ubject to Section 367(d)				(5)	
Type of property	(a) Date of transfer	(b) Description of property		(d) rm's length price n date of transfer	(e) Cost or other basis	Income inclufor year of tra	ansfer
Property described in sec. 367(d)(4)							
Totals							

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	No

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

Sequence No. 128

Attachment

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is no	t a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor	controlled (under section 368(c)) by
	Yes No
	Yes No
If not, list the controlling shareholder(s) and their identifying number(s	
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidat corporation?	·
If not, list the name and employer identification number (EIN) of the pa	
in not, list the name and employer identification number (Env) of the pe	icht Gorporation.
Name of parent corporation	EIN of parent corporation
Name of parent corporation d Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual trancomplete questions 3a through 3d.	Yes No
 d 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 	Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual trancomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	Yes No Seferor (but is not treated as such under section 367),
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual trancomplete questions 3a through 3d. 	Yes No
d Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership	Yes No Seferor (but is not treated as such under section 367), EIN of partnership
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual trancomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V	Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual trancomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of partnership.	Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 nership assets? Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part c Is the partner disposing of its entire interest in the partnership?	Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 nership assets? Yes X No Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 reserved.	EIN of partnership 82-2022562 nership assets? Yes No Yes No Yes X No Yes X No Gularly traded on an established
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market?	Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (Tyes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4) Name of transferee (foreign corporation)	Tyes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Sketch B.V Flight Forum	Tyes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 nership assets? Yes X No yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Sketch B.V Flight Forum 6 Address (including country)	EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Sketch B.V Flight Forum 6 Address (including country) 40 5657 DB	EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of particular interest in the partnership? d 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Sketch B.V Flight Forum 6 Address (including country) 40 5657 DB Eidhoven NL Netherlands 7 Country code of country of incorporation or organization (see instruction)	EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Sketch B.V Flight Forum 6 Address (including country) 40 5657 DB Eidhoven NL Netherlands 7 Country code of country of incorporation or organization (see instruction NL 8 Foreign law characterization (see instructions)	EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of particular interest in the partnership? d 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Sketch B.V Flight Forum 6 Address (including country) 40 5657 DB Eidhoven NL Netherlands 7 Country code of country of incorporation or organization (see instruction)	TelN of partnership 82-2022562 nership assets? Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)

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Part III Inform Section A—Cash	nation Regard	ing Transfer of Property (see	: instructi	ons)		
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	06/25/19	property		119	Dasis	uansici
	remainder of Part I	II and go to Part IV.				X Yes No
	roperty (other to	han intangible property subject (b)	to secti	on 367(d)) (c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Stock and						
securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
foreign corporation of "Yes," go to line b Was the transferor (including a branch of "Yes," continue c Immediately after transferee foreign of "Yes," continue d Enter the transferor of "No," skip Section	of a foreign branch on? 12b. or a domestic corpor to line 12c. If "No," the transfer, was to a corporation? to line 12d. If "No, red loss amount in transfer property of	" skip line 12d, and go to line 13. cluded in gross income as required u described in section 367(d)(4)?s 14a through 15.	all of the as 6-owned for e 13. eholder wit	ssets of a foreign brain oreign corporation?	nch	Yes No Yes No Yes No Yes No Yes No
Section C—Intangib	ole Property Sul	bject to Section 367(d)				_
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Attachment

Sequence No. 128 Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Truebridge Capital Partners Fund V **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?.. Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any Rekki Limited Address (including country) 5b Reference ID number 727-729 High Road (see instructions) Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation

Is the transferee foreign corporation a controlled foreign corporation?

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Part III Inform	ation Regar	ding Transfer of Property (see	instructi	ons)		
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	08/30/1			93		
	emainder of Par	erred? t III and go to Part IV. than intangible property subject				X Yes No
Type of property	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
	transfer	property		date of transfer	basis	transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	n? 12b. r a domestic corn that is a foreign to line 12c. If "Nother transfer, was corporation? to line 12d. If "Nother loss amount transfer property	poration that transferred substantially all n disregarded entity) to a specified 10% o," skip lines 12c and 12d, and go to lines the domestic corporation a U.S. sharel o," skip line 12d, and go to line 13. included in gross income as required urly described in section 367(d)(4)?	disregarde	ed entity) transferred sets of a foreign bra preign corporation? h respect to the	to a	Yes No Yes No Yes No Yes No
Section C—Intangib		ubject to Section 367(d)	1			(6)
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	No

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

Sequence No. 128

Attachment

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is no	a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor of	ontrolled (under section 368(c)) by
	Yes No
	Yes No
If not, list the controlling shareholder(s) and their identifying number(s)	•
Controlling shareholder	Identifying number
a liftha transferor was a manufact of an affiliated every filing a consolidat	ad underson transit the mount
c If the transferor was a member of an affiliated group filing a consolidat corporation?	·
'	
If not, list the name and employer identification number (EIN) of the pa	rent corporation.
Name of parent corporation	EIN of parent corporation
Name of parent corporation	EIN of parent corporation
Name of parent corporation d Have basis adjustments under section 367(a)(4) been made?	
d Have basis adjustments under section 367(a)(4) been made?	Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. 	Yes No
d Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transferor.	Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	Yes No Seferor (but is not treated as such under section 367),
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. 	Yes No
d Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership	Yes No Seferor (but is not treated as such under section 367), EIN of partnership
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V	Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of partnership.	Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 nership assets? Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part c Is the partner disposing of its entire interest in the partnership?	Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 nership assets? Yes X No Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 re	EIN of partnership 82-2022562 nership assets? Yes No Yes No Yes X No Yes X No Gularly traded on an established
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market?	Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 re	Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5a Identifying number, if any
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5a Identifying number, if any
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Wildlife Studios Rua Doutor Doutor	EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Wildlife Studios Rua Doutor Doutor 6 Address (including country) 1017 Conj. 81 Itaim Bibi Sao Paolo BR 04530-001 Brazil	EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Wildlife Studios Rua Doutor Doutor 6 Address (including country) 1017 Conj. 81 Itaim Bibi Sao Paolo BR 04530-001 Brazil 7 Country code of country of incorporation or organization (see instruction)	EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its promata share of gain on the transfer of particular 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Wildlife Studios Rua Doutor Doutor 6 Address (including country) 1017 Conj. 81 Itaim Bibi Sao Paolo BR 04530-001 Brazil 7 Country code of country of incorporation or organization (see instruction BR)	EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of particular 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Wildlife Studios Rua Doutor Doutor 6 Address (including country) 1017 Conj. 81 Itaim Bibi Sao Paolo BR 04530-001 Brazil 7 Country code of country of incorporation or organization (see instruction BR 8 Foreign law characterization (see instructions)	EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its promata share of gain on the transfer of particular 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) Wildlife Studios Rua Doutor Doutor 6 Address (including country) 1017 Conj. 81 Itaim Bibi Sao Paolo BR 04530-001 Brazil 7 Country code of country of incorporation or organization (see instruction BR)	EIN of partnership 82-2022562 nership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)

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	ation Regard	ding Transfer of Property (see	instruction	ons)		
Section A—Cash Type of property	(a) Date of	(b) Description of	1	(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
Cash	transfer 12/05/19	property		date of transfer 464	basis	transfer
	emainder of Part	III and go to Part IV.				X Yes No
		than intangible property subject	to section		(4)	(0)
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 b Was the transferor (including a branch If "Yes," continue t c Immediately after transferee foreign If "Yes," continue t d Enter the transferr	n? 12b. r a domestic corp h that is a foreigr to line 12c. If "No the transfer, was corporation? to line 12d. If "No ed loss amount i transfer property	," skip line 12d, and go to line 13. ncluded in gross income as required ur described in section 367(d)(4)?	I of the as o-owned for e 13. holder wit	sets of a foreign brain preign corporation? The respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Sເ	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Attachment Sequence No. 128

Internal Revenue Service U.S. Transferor Information (see instructions) Part I Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Truebridge Capital Partners Fund V **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any Fair Play Holdings, LTD Address (including country) 5b Reference ID number (see instructions) Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation

Is the transferee foreign corporation a controlled foreign corporation?

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Part III Inform Section A—Cash	nation Regardi	ng Transfer of Property (see	e instructi	ons)		
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	C	property		284	busio	uunoiei
	remainder of Part II	I and go to Part IV.				X Yes No
	roperty (other th	nan intangible property subject	to section	on 367(d)) (c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Stock and						
securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
foreign corporatio If "Yes," go to line b Was the transfero (including a branc If "Yes," continue c Immediately after transferee foreign If "Yes," continue d Enter the transferor If "No," skip Section	of a foreign branch in? 12b. or a domestic corpo th that is a foreign of to line 12c. If "No," the transfer, was the corporation? to line 12d. If "No," red loss amount ince transfer property do on C and questions	skip line 12d, and go to line 13. cluded in gross income as required ulescribed in section 367(d)(4)?	all of the as %-owned for le 13. eholder wit	esets of a foreign brain preign corporation? The respect to the	nch	Yes No Yes No Yes No Yes No Yes No
Section C—Intangib	ole Property Sub	ject to Section 367(d)				_
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Attachment Sequence No. 128

	or the year of the transfer or distribution.	Sec	quence	No. 128
Part I U.S. Transferor Information (see instructions)				
Name of transferor Henry County Community Foundation,	Identifying num	ber (s	ee instr	uctions)
Inc.	31-11704	<u> 12</u>		
1 Is the transferee a specified 10%-owned foreign corporation that is not	a controlled foreign corporation?		Yes	No
2 If the transferor was a corporation, complete questions 2a through 2d.				
a If the transfer was a section 361(a) or (b) transfer, was the transferor co	ontrolled (under section 368(c)) by			
		. Ц	Yes	□ No
		. Ш	Yes	No
If not, list the controlling shareholder(s) and their identifying number(s).				
Controlling shareholder	Identifying number			
c If the transferor was a member of an affiliated group filing a consolidate	ed return, was it the parent			
corporation?			Yes	No
If not, list the name and employer identification number (EIN) of the par	ent corporation.			
	'			
Name of parent corporation	EIN of parent corporation			
d Have basis adjustments under section 367(a)(4) been made?			Yes	No
Triave basis adjustifients under section 307(a)(4) been made:		. Ш	163	
3 If the transferor was a partner in a partnership that was the actual trans	feror (but is not treated as such under section 367),			
complete questions 3a through 3d.				
a List the name and EIN of the transferor's partnership.				
Name of partnership	EIN of partnership			
Truebridge Capital Partners Fund V	82-2022562			
b Did the partner pick up its pro rata share of gain on the transfer of partr	nership 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 reg	ularly traded on an established			
securities market?			Yes	X No
Part II Transferee Foreign Corporation Information (s				
4 Name of transferee (foreign corporation)	5a Identifying nu	mber	, if any	
Fidel Holdings LTD				
6 Address (including country)	5b Reference ID n	umbe	er	
	(see instructions)			
7 Country and of country of incommention as a surjective for a fine	200			
7 Country code of country of incorporation or organization (see instruction	118)			
8 Foreign law characterization (see instructions)				
Corporation				
9 Is the transferee foreign corporation a controlled foreign corporation?			Yes	X No
is the transfered foreign corporation a controlled foreign corporation?			100	22 140

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	ation Regar	ding Transfer of Property (se	e instruction	ons)			
Section A—Cash					, , ,		
Type of property	(a) Date of transfer	(b) Description of property	1	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recogr transf	
Cash		9		637			
	emainder of Par	t III and go to Part IV.				X Yes	☐ No
	operty (otner (a)	than intangible property subjec	t to section	on 367(a)) (c)	(d)	(e)	
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recogr transf	
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with							
built-in loss							
Totals							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue t c Immediately after transferee foreign If "Yes," continue t d Enter the transferor	n? 12b. r a domestic corn that is a foreign to line 12c. If "Nother transfer, was corporation? to line 12d. If "Nother loss amount transfer property	poration that transferred substantially in disregarded entity) to a specified 10° o," skip lines 12c and 12d, and go to lines the domestic corporation a U.S. sharto," skip line 12d, and go to line 13. included in gross income as required by described in section 367(d)(4)?	all of the as %-owned fone 13. reholder wit	esets of a foreign bra preign corporation? th respect to the	nch	Yes Yes Yes Yes	No No No No
Section C—Intangib	le Property S	ubject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income income for year of to (see instru	transfer
Property described							
in sec. 367(d)(4)							
. , ,							
 Totals							

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	14a Did the transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?				
h			Yes Yes	\vdash	No No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		N ₀
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes	X	No
d					
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	No

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

Attachment Sequence No. 128

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation, Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is 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	
	Yes No
. 5:10	Yes No
If not, list the controlling shareholder(s) and their identifying number(s	
, , , , , , , , , , , , , , , , , , , ,	,
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidate	
corporation?	Yes No
If not, list the name and employer identification number (EIN) of the p	arent corporation.
	T
Name of parent corporation	EIN of parent corporation
·	· ·
d Have basis adjustments under section 367(a)(4) been made?	Yes No
Trave basis adjustments under section 507 (a)(4) been made:	
3 If the transferor was a partner in a partnership that was the actual tra	nsferor (but is not treated as such under section 367),
complete questions 3a through 3d. a List the name and EIN of the transferor's partnership.	
a List the name and Lin of the transferor's partnership.	
Name of partnership	EIN of partnership
Truebridge Capital Partners Fund V	82-2022562
b Did the partner pick up its pro rata share of gain on the transfer of pa	
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 re	
securities market?	
Part II Transferee Foreign Corporation Information	(see instructions)
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Minu Holdings PTY LTD	
6 Address (including country)	5b Reference ID number
	(see instructions)
7 Country code of country of incorporation or organization (see instruct	ons)
Foreign law characterization (see instructions)	
 Foreign law characterization (see instructions) Corporation Is the transferee foreign corporation a controlled foreign corporation? 	

Form 926 (Rev. 11-2018) Henry County Community Foundation, 31-1170412

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Part III Inform Section A—Cash	nation Regardi	ng Transfer of Property (see	e instructi	ons)		
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	O C	property		458	Bucio	uanoror
	remainder of Part II	I and go to Part IV.				🗓 Yes 🗌 No
	roperty (other th	nan intangible property subject	t to secti	on 367(d)) (c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Stock and						
securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Duiit-in ioss						
Totals						
foreign corporation of "Yes," go to line b Was the transferor (including a branch of "Yes," continue c Immediately after transferee foreign of "Yes," continue d Enter the transferor of "No," skip Section	of a foreign branch on? 12b. or a domestic corpo th that is a foreign of to line 12c. If "No," the transfer, was the corporation? to line 12d. If "No," red loss amount ince transfer property do on C and questions	skip line 12d, and go to line 13. cluded in gross income as required ulescribed in section 367(d)(4)?	all of the as %-owned for ne 13. eholder wit	esets of a foreign brain preign corporation? The respect to the	nch	Yes No Yes No Yes No Yes No Yes No
Section C—Intangib	ole Property Sub	ject to Section 367(d)		1		
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Attachment Sequence No. 1

	or the year of the transfer or distribution. Sequence No. 128
Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	21 1170412
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is no	a controlled foreign corporation? Yes No
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 of	entrolled (under section 269(e)) by
	Yes No
If not, list the controlling shareholder(s) and their identifying number(s)	
in not, not the controlling characteristics and their facilitying hamber(o)	•
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidate	ed return, was it the parent
corporation?	
If not, list the name and employer identification number (EIN) of the pa	rent corporation.
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(4) been made?	Yes No
u Have basis adjustifients under section 307(a)(4) been made:	Tes No
3 If the transferor was a partner in a partnership that was the actual tran	sferor (but is not treated as such under section 367),
complete questions 3a through 3d.	
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
Truebridge Capital Partners Fund V	82-2022562
b Did the partner pick up its pro rata share of gain on the transfer of part	nership 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 re	gularly traded on an established
securities market?	Yes X No
Part II Transferee Foreign Corporation Information (see instructions)
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Rest less UK	
6 Address (including country)	5b Reference ID number
	(see instructions)
7 Country code of country of incorporation or organization (see instruction	ons)
8 Foreign law characterization (see instructions)	
Corporation9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No

		Transfer of Property (see			0412	Page 2
Part III Inform Section A—Cash	ation Regardi	ng Transfer of Property (see	Instructi	ons)		
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	d	,		391		
	emainder of Part II	ed? I and go to Part IV. an intangible property subject				X Yes No
	(a)	(b)	lo section	(c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
recognition agreen 12a Were any assets of foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to the transferee foreign If "Yes," continue to the transferor if "No," skip Section	nent was filed? of a foreign branch 12b. a domestic corpo n that is a foreign of to line 12c. If "No," the transfer, was the corporation? o line 12d. If "No," ed loss amount income transfer property do on C and questions		I of the as -owned for 13. holder wit	ed entity) transferred ssets of a foreign bra preign corporation? th respect to the	to a	Yes No Yes No Yes No Yes No Yes No
Section C—Intangib		ject to Section 367(d)	1			(6)
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totala						i

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	No

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

Attachment

Sequence No. 128

Identifying number (see instructions)
31-1170412
orporation? Yes No
n 368(c)) by
Yes No
Yes No
Identifying number
rent Yes No
EIN of parent corporation
Yes No
Yes No d as such under section 367),
d as such under section 367),
d as such under section 367), EIN of partnership
d as such under section 367), EIN of partnership 82-2022562
EIN of partnership 82-2022562 Yes X No
EIN of partnership 82-2022562 Yes X No Yes X No
EIN of partnership 82-2022562 Yes X No
EIN of partnership 82-2022562 Yes X No Yes X No tablished
EIN of partnership 82-2022562 Yes X No Yes X No tablished
EIN of partnership 82-2022562 Yes X No Yes X No tablished Yes X No
EIN of partnership 82-2022562 Yes X No Yes X No tablished Yes X No tablished 5a Identifying number, if any 5b Reference ID number
EIN of partnership 82-2022562 Yes X No Yes X No tablished Yes X No
EIN of partnership 82-2022562 Yes X No Yes X No tablished Yes X No tablished 5a Identifying number, if any 5b Reference ID number
EIN of partnership 82-2022562 Yes X No Yes X No tablished Yes X No tablished 5a Identifying number, if any 5b Reference ID number
EIN of partnership 82-2022562 Yes X No Yes X No tablished Yes X No tablished 5a Identifying number, if any 5b Reference ID number

Part III Inform		ng Transfer of Property (see			0412	Page 4
Section A—Cash						
Type of	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
property Cash	transfer	property		date of transfer 375	basis	transfer
10 Was cash the only If "Yes," skip the r	y property transferre	l and go to Part IV.				X Yes No
-	roperty (other th	an intangible property subject	to section	on 367(d)) (c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Stock and		property			240.0	
securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
foreign corporation If "Yes," go to line b Was the transfero (including a branc) If "Yes," continue c Immediately after transferee foreign If "Yes," continue d Enter the transferor 13 Did the transferor	of a foreign branch n? 12b. r a domestic corpor th that is a foreign d to line 12c. If "No," the transfer, was th corporation? to line 12d. If "No," red loss amount inc	(including a branch that is a foreign fration that transferred substantially a lisregarded entity) to a specified 10% skip lines 12c and 12d, and go to line domestic corporation a U.S. share skip line 12d, and go to line 13. Sluded in gross income as required u escribed in section 367(d)(4)?	disregarde	ed entity) transferred sets of a foreign bra preign corporation? th respect to the on 91 \$\bigsec\$	to a	Yes No Yes No Yes No Yes No Yes No
Section C—Intangib	ole Property Sub	ject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals		_				

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ц	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Attachment Sequence No. 1

	or the year of the transfer or distribution. Sequence No. 128
Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	21 1150410
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is no	a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor of	
1 5:10 (6) : : : (6 0) (6 0	Yes No
	Yes No
If not, list the controlling shareholder(s) and their identifying number(s)	•
Controlling shareholder	Identifying number
Controlling Shareholder	identifying fidiniser
c If the transferor was a member of an affiliated group filing a consolidat	
corporation?	Yes No
If not, list the name and employer identification number (EIN) of the pa	rent corporation.
	·
Name of parent corporation	EIN of parent corporation
The state of particular particular state of pa	o. pa.o po.u
d Harrie harria adirector and an artificial 207/5//4/ harrianda 0	□ V □ N-
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 tran	sferor (but is not treated as such under section 367),
complete questions 3a through 3d.	
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
	<u></u>
Burchaides Conital Booksons Burd II	00 0000560
Truebridge Capital Partners Fund V	82-2022562
b Did the partner pick up its pro rata share of gain on the transfer of part	
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 re	
securities market?	Yes X No
Part II Transferee Foreign Corporation Information (
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Escale (Quinhentos LLC)	
6 Address (including country)	5b Reference ID number
	(see instructions)
7 Country and of country of incommention as a superior for the first factor of the fir	
7 Country code of country of incorporation or organization (see instruction	ns)
O Familian land about the distriction (as in the contraction (as in	
8 Foreign law characterization (see instructions)	
Corporation9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
	I VAC X NA

		Transfer of Property (see			0412	Page 2
Part III Inform Section A—Cash	ation Regardin	ng Transfer of Property (see	mstructi	ons)		
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	O			640		
	emainder of Part III					X Yes No
Type of	(a)	(b)	to section	(c)	(d)	(e)
property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	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 b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	n? 12b. 12b. 1a domestic corporate that is a foreign disposition of line 12c. If "No," state transfer, was the corporation? 1a line 12d. If "No," state loss amount incless.	ation that transferred substantially a isregarded entity) to a specified 10% skip lines 12c and 12d, and go to line e domestic corporation a U.S. share skip line 12d, and go to line 13. Iuded in gross income as required upscribed in section 367(d)(4)?	II of the as o-owned fo e 13. sholder wit	esets of a foreign braceign corporation? The respect to the son 91	nch	Yes No Yes No Yes No Yes No
Section C—Intangible	le Property Subj	ect to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totala					<u> </u>	

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	No

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

Sequence No. 128

Attachment

Pa	art I U.S. Transferor Information (see instructions)	
	e of transferor	Identifying number (see instructions)
Η	enry County Community Foundation,	
I:	nc.	31-1170412
1	Is the transferee a specified 10%-owned foreign corporation that is not a	controlled foreign corporation? Yes No
2	If the transferor was a corporation, complete questions 2a through 2d.	
а	If the transfer was a section 361(a) or (b) transfer, was the transferor con	trolled (under section 368(c)) by
		Yes No
b		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 corporation?	
	If not, list the name and employer identification number (EIN) of the pare	
		nt corneration
	in not, list the name and employer identification number (Env) of the pare	nt corporation.
	Name of parent corporation	EIN of parent corporation
d	Name of parent corporation	EIN of parent corporation
3	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d.	EIN of parent corporation
3	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	EIN of parent corporation Yes No eror (but is not treated as such under section 367),
3	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d.	EIN of parent corporation
3	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	EIN of parent corporation Yes No eror (but is not treated as such under section 367),
3 <u>a</u>	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V	EIN of parent corporation Yes No eror (but is not treated as such under section 367), EIN of partnership 81-2022562
3 <u>a</u>	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership	EIN of parent corporation Yes Noteror (but is not treated as such under section 367), EIN of partnership 81-2022562 rship assets? Yes X No
3 a b c	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of partne Is the partner disposing of its entire interest in the partnership?	EIN of parent corporation Yes No Pror (but is not treated as such under section 367), EIN of partnership 81-2022562 rship assets? Yes X No Yes X No
3 a b c	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of partne Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regulated the securities market?	EIN of parent corporation Yes No Pror (but is not treated as such under section 367), EIN of partnership 81-2022562 rship assets? Yes X No larly traded on an established Yes X No
a a b c	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of partne Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regu	EIN of parent corporation Yes No Pror (but is not treated as such under section 367), EIN of partnership 81-2022562 rship assets? Yes X No larly traded on an established Yes X No
a a b c	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of partne Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regulated. Transferee Foreign Corporation Information (Section 1)	EIN of parent corporation Yes No Pror (but is not treated as such under section 367), EIN of partnership 81-2022562 rship assets? Yes X No larly traded on an established Yes X No
3 a b c d	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of partne Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regulated in the partnership that is regulated. Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) Roger	EIN of parent corporation Yes No For (but is not treated as such under section 367), EIN of partnership 81-2022562 This passets? Yes X No Yes X No Per instructions) Sa Identifying number, if any
3 a b c d	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of partne Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regulated in the partnership that is regulated. Transferee Foreign Corporation Information (see Name of transferee (foreign corporation)	EIN of parent corporation Yes No Pror (but is not treated as such under section 367), EIN of partnership 81-2022562 This passets? Yes X No Yes X No Per instructions) 5a Identifying number, if any 5b Reference ID number
3 a b c d	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of partne Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regulated in the partnership that is regulated. Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) Roger	EIN of parent corporation Yes No For (but is not treated as such under section 367), EIN of partnership 81-2022562 This passets? Yes X No Yes X No Per instructions) Sa Identifying number, if any
3 a b c d	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of partne Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regulated in the partnership that is regulated. Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) Roger	EIN of parent corporation Yes No eror (but is not treated as such under section 367), EIN of partnership 81 – 2022562 rship assets? Yes X No larly traded on an established Yes X No ee instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
3 a b c d d P 6 7	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfer complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of partner is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regu securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) Roger Address (including country) Country code of country of incorporation or organization (see instructions)	EIN of parent corporation Yes No eror (but is not treated as such under section 367), EIN of partnership 81 – 2022562 rship assets? Yes X No larly traded on an established Yes X No ee instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
3 a b c d d P 6 7	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transfe complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of partne Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is regu securities market? art II Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) Roger Address (including country)	EIN of parent corporation Pror (but is not treated as such under section 367), EIN of partnership 81-2022562 rship assets? Yes X No Yes X No larly traded on an established re instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)

		Transfer of Property (see			0412	Page 2
Part III Inform Section A—Cash	ation Regardin	ng Transfer of Property (see	mstructi	ons)		
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	O			640		
	emainder of Part III					X Yes No
Type of	(a)	(b)	to section	(c)	(d)	(e)
property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	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 b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	n? 12b. 12b. 1a domestic corporate that is a foreign disposition of line 12c. If "No," state transfer, was the corporation? 1a line 12d. If "No," state loss amount incless.	ation that transferred substantially a isregarded entity) to a specified 10% skip lines 12c and 12d, and go to line e domestic corporation a U.S. share skip line 12d, and go to line 13. Iuded in gross income as required upscribed in section 367(d)(4)?	II of the as o-owned fo e 13. sholder wit	esets of a foreign braceign corporation? The respect to the son 91	nch	Yes No Yes No Yes No Yes No
Section C—Intangible	le Property Subj	ect to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totala					<u> </u>	

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	No

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

Sequence No. 128

Attachment

Identifying number (see instructions)
31-1170412
t a controlled foreign corporation? Yes No
controlled (under section 368(c)) by
Yes No
Yes No
).
Identifying number
ed return, was it the parent
arent corporation.
nent corporation.
EIN of parent corporation
Yes No
sferor (but is not treated as such under section 367),
sferor (but is not treated as such under section 367),
sferor (but is not treated as such under section 367), EIN of partnership
EIN of partnership
EIN of partnership 82-2022562
EIN of partnership 82-2022562 tnership assets? Yes X No
EIN of partnership 82-2022562 tnership assets? Yes X No Yes X No
EIN of partnership 82-2022562 tnership assets? Yes X No Yes X No gularly traded on an established
EIN of partnership 82-2022562 tnership assets? Yes X No Yes X No
EIN of partnership 82-2022562 tnership assets? Yes X No gularly traded on an established Yes X No
EIN of partnership 82-2022562 Inership assets? Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any
EIN of partnership 82-2022562 Intership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5a Identifying number, if any 5b Reference ID number
EIN of partnership 82-2022562 Inership assets? Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any
EIN of partnership 82-2022562 Inership assets? Yes X No Yes X No Ingularly traded on an established Yes X No See instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
EIN of partnership 82-2022562 Intership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5a Identifying number, if any 5b Reference ID number
EIN of partnership 82-2022562 Inership assets? Yes X No Yes X No Igularly traded on an established Yes X No See instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
EIN of partnership 82-2022562 Inership assets? Yes X No Yes X No Igularly traded on an established Yes X No See instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)

		ding Transfer of Property (see			0112	Fage 4
Section A—Cash						
Type of property	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
Cash	transfer 09/30/19	property		date of transfer	basis	transfer
	mainder of Par	erred? t III and go to Part IV. than intangible property subject				X Yes No
Type of property	(a) Date of	(b) Description of		(c) Fair market value on date of transfer	(d) Cost or other	(e) Gain recognized on
Stock and	transfer	property		date of transfer	basis	transfer
securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
foreign corporation If "Yes," go to line of b Was the transferor (including a branch If "Yes," continue to c Immediately after the transferee foreign of If "Yes," continue to d Enter the transferre	f a foreign brand? 12b. a domestic corporation? bline 12c. If "Note transfer, was corporation? bline 12d. If "Noted loss amount ransfer property		lisregarde	ed entity) transferred seets of a foreign braceign corporation? th respect to the	to a	Yes No Yes No Yes No Yes No
Section C—Intangibl	e Property S	ubject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	No

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

Attachment Sequence No. 128

Part I U.S. Transferor Information (see instructions)	·
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is no	t a controlled foreign corporation?
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	
. 5:10	
If not, list the controlling shareholder(s) and their identifying number(s	
in not, list the controlling shareholder(s) and their identifying humber(s)·
Controlling shareholder	Identifying number
Controlling Statistical	identifying number
c If the transferor was a member of an affiliated group filing a consolida	ted return, was it the parent
corporation?	·
If not, list the name and employer identification number (EIN) of the p	prent corporation
if flot, list the flame and employer identification flumber (Env) of the p	areni corporation.
Name of parent corporation	EIN of parent corporation
Name of parent corporation	
Name of parent corporation	
	EIN of parent corporation
d Have basis adjustments under section 367(a)(4) been made?	EIN of parent corporation Yes No
 d 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 	EIN of parent corporation Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. 	EIN of parent corporation Yes No
 d 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 	EIN of parent corporation Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. 	EIN of parent corporation Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	EIN of parent corporation Yes No sferor (but is not treated as such under section 367),
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V	EIN of parent corporation Yes No seferor (but is not treated as such under section 367), EIN of partnership 82-2022562
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of partnership.	EIN of parent corporation Yes No seferor (but is not treated as such under section 367), EIN of partnership 82-2022562 tnership assets? Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of parts the partner disposing of its entire interest in the partnership?	EIN of parent corporation Yes No seferor (but is not treated as such under section 367), EIN of partnership 82-2022562 thership assets? Yes X No Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of parts the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is reference.	EIN of parent corporation Yes No seferor (but is not treated as such under section 367), EIN of partnership 82-2022562 thership assets? Yes X No Yes X No egularly traded on an established
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market?	EIN of parent corporation Yes No seferor (but is not treated as such under section 367), EIN of partnership 82-2022562 thership assets? Yes X No yes X No gularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information	EIN of parent corporation Yes No seferor (but is not treated as such under section 367), EIN of partnership 82-2022562 thership assets? Yes X No Yes X No segularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation)	EIN of parent corporation Yes No seferor (but is not treated as such under section 367), EIN of partnership 82-2022562 thership assets? Yes X No yes X No gularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of partice 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Cheq AI Technologies	EIN of parent corporation Yes No see instructions) Yes No Yes X No See instructions) Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Cheq AI Technologies 6 Address (including country)	EIN of parent corporation Yes No seferor (but is not treated as such under section 367), EIN of partnership 82-2022562 thership assets? Yes X No yes X No egularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of partice 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Cheq AI Technologies	EIN of parent corporation Yes No see instructions) Yes No Yes X No See instructions) Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Cheq AI Technologies 6 Address (including country)	EIN of parent corporation Yes No seferor (but is not treated as such under section 367), EIN of partnership 82-2022562 thership assets? Yes X No yes X No egularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Cheq AI Technologies 6 Address (including country) 23 Yehuda Halevi St	EIN of parent corporation Yes No asferor (but is not treated as such under section 367), EIN of partnership 82-2022562 thership assets? Yes X No Yes X No egularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Cheq AI Technologies 6 Address (including country) 23 Yehuda Halevi St Tel Aviv Is 6513601 Israel	EIN of parent corporation Yes No seferor (but is not treated as such under section 367), EIN of partnership 82-2022562 thership assets? Yes X No Yes X No egularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of particles to the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Cheq AI Technologies 6 Address (including country) 23 Yehuda Halevi St Tel Aviv IS 6513601 Israel 7 Country code of country of incorporation or organization (see instruction)	EIN of parent corporation Yes No seferor (but is not treated as such under section 367), EIN of partnership 82-2022562 thership assets? Yes X No Yes X No egularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Cheq AI Technologies 6 Address (including country) 23 Yehuda Halevi St Tel Aviv IS 6513601 Israel 7 Country code of country of incorporation or organization (see instructions)	EIN of parent corporation Yes No seferor (but is not treated as such under section 367), EIN of partnership 82-2022562 thership assets? Yes X No Yes X No egularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)

Form 926 (Rev. 11-2018) Henry County Community Foundation, 31-1170412

Page	2
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Part III Informa	ation Rega	rding Transfer of Property (see i	nstruction	ons)			
Section A—Cash							
Type of property	(a) Date of transfer	(b) Description of property	F	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recogni transfe	
Cash		q		90			
	emainder of Pa	rt III and go to Part IV.				_ X Yes [No No
	operty (otne (a)	r than intangible property subject t	o sectio	on 367(d)) (c)	(d)	(0)	
Type of property	Date of transfer	Description of property	ı	Fair market value on date of transfer	Cost or other basis	Gain recogni transfe	
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with							
built-in loss							
Totals							
foreign corporation If "Yes," go to line of the was the transferor (including a branch of "Yes," continue to transferee foreign of the was a continue to t	f a foreign brains? 12b. a domestic conthat is a foreign line 12c. If "Net transfer, was corporation? o line 12d. If "Net loss amountainsfer proper	proporation that transferred substantially all gn disregarded entity) to a specified 10%-lo," skip lines 12c and 12d, and go to line as the domestic corporation a U.S. shareh loo," skip line 12d, and go to line 13. It included in gross income as required unoty described in section 367(d)(4)?	of the as owned fo 13. colder with	ed entity) transferred sets of a foreign bra breign corporation? h respect to the	to a	Yes Yes Yes Yes Yes Yes	No No No No No
Section C—Intangibl	e Property S	Subject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income incl for year of tr (see instru	ansfer
Property described in sec. 367(d)(4)							
						1	
Totals							

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	No

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

Sequence No. 128

Attachment

Part I U.S. Transferor Information (see instructions)	•
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is no	t a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor	controlled (under section 368(c)) by
	Yes No
	Yes No
If not, list the controlling shareholder(s) and their identifying number(s).
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidar corporation?	·
•	
If not, list the name and employer identification number (EIN) of the pa	HEN CONORADON
	non corporation.
Name of parent corporation	EIN of parent corporation
	EIN of parent corporation
Name of parent corporation d Have basis adjustments under section 367(a)(4) been made?	EIN of parent corporation Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. 	EIN of parent corporation Yes No
 d 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 	EIN of parent corporation Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. 	EIN of parent corporation Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	EIN of parent corporation Yes No sferor (but is not treated as such under section 367),
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562
d Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of parts 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 re-	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 Inership assets? Yes X No Yes X No Gularly traded on an established
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market?	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 Inership assets? Yes X No Yes X No gularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (1997)	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 Intership assets? Yes X No gularly traded on an established Yes X No see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 Inership assets? Yes X No Yes X No gularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4)	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 Intership assets? Yes X No gularly traded on an established Yes X No see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (GS Pledge Co Limited)	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 Inership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (GS Pledge Co Limited) 6 Address (including country)	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 Intership assets? Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) GS Pledge Co Limited 6 Address (including country) Ashley Road	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 Intership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) GS Pledge Co Limited 6 Address (including country) Ashley Road Altrincham Cheshire UK WA142DT Great Britain	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 Intership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) GS Pledge Co Limited 6 Address (including country) Ashley Road Altrincham Cheshire UK WA142DT Great Britain 7 Country code of country of incorporation or organization (see instruction UK 8 Foreign law characterization (see instructions)	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 Intership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) GS Pledge Co Limited 6 Address (including country) Ashley Road Altrincham Cheshire UK WA142DT Great Britain 7 Country code of country of incorporation or organization (see instruction)	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 82-2022562 Intership assets? Yes X No yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)

Form 926 (Rev. 11-2018) Henry County Community Foundation, 31-1170412

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Part III Inform Section A—Cash	ialion Regard	ing Transfer of Property (see	Instruction	ons)		
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	12/27/18	property		358	busis	uunoici
	emainder of Part I	III and go to Part IV.				X Yes No
	roperty (other t	han intangible property subject (b)	to section	on 367(d)) (c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Stock and						
Inventory			-+			
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
foreign corporation If "Yes," go to line b Was the transfero (including a branc) If "Yes," continue c Immediately after transferee foreign If "Yes," continue d Enter the transferi	n? 12b. r a domestic corport that is a foreign to line 12c. If "No, the transfer, was corporation? to line 12d. If "No, red loss amount in transfer property of the standard tra	" skip line 12d, and go to line 13. ncluded in gross income as required undescribed in section 367(d)(4)?	II of the as 6-owned for e 13. Pholder wit	esets of a foreign brain preign corporation?	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Sul	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	No

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

Attachment Sequence No. 128

Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Truebridge Capital Partners Fund V **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) 5a Identifying number, if any LN Pledge Co Limited 98-1439096 5b Reference ID number Address (including country) 6 Coke Lane Smithfield (see instructions) EI DO7 EDP2 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation Is the transferee foreign corporation a controlled foreign corporation? Yes

Form 926 (Rev. 11-2018) Henry County Community Foundation, 31-1170412

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	ation Regar	ding Transfer of Property (see	instructi	ons)			
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	Gain recog	gnized on
Cash	05/24/1			238	Bacic	trunc	7101
	emainder of Par	erred? t III and go to Part IV. than intangible property subject		on 367(d))		X Yes	☐ No
	(a)	(b)	lo section	(c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recog trans	nized on
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with built-in loss							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	n? 12b. r a domestic cor n that is a foreig to line 12c. If "N the transfer, wa corporation? to line 12d. If "N ed loss amount transfer propert	poration that transferred substantially a n disregarded entity) to a specified 10% o," skip lines 12c and 12d, and go to lines the domestic corporation a U.S. share o," skip line 12d, and go to line 13. included in gross income as required up described in section 367(d)(4)?	ill of the as 6-owned fo e 13. eholder wit	ssets of a foreign brain preign corporation? The respect to the	nch	Yes Yes Yes	No No No No
Section C—Intangib	le Property S	ubject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income in for year of (see inst	nclusion
Property described in sec. 367(d)(4)							
Totals					<u>-</u>		· · · · · · · · · · · · · · · · · · ·

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Sequence No. 128

Attachment

Internal Revenue Service Attach to your income tax return f	for the year of the transfer or distribution.	Sequence N	o. 128
Part I U.S. Transferor Information (see instructions)			
Name of transferor Henry County Community Foundation,	Identifying num	•	ctions)
Inc.	31-11704	12	
1 Is the transferee a specified 10%-owned foreign corporation that is not	t a controlled foreign corporation?	Yes	No
2 If the transferor was a corporation, complete questions 2a through 2d.			
a If the transfer was a section 361(a) or (b) transfer, was the transferor of	ontrolled (under section 368(c)) by		
			□ No
		Yes	No
If not, list the controlling shareholder(s) and their identifying number(s)			
Controlling shareholder	Identifying number		
c If the transferor was a member of an affiliated group filing a consolidat	ed return, was it the parent		
corporation?	······································	. Yes	No
If not, list the name and employer identification number (EIN) of the pa	erent corporation		
- The state manife and employer rachaneager named (2117) of the pe	Total 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 tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	sferor (but is not treated as such under section 367),		
Name of partnership	EIN of partnership		
Name of partnership	EIN of partnership		
Truebridge Capital Partners Fund V	82-2022562		
b Did the partner pick up its pro rata share of gain on the transfer of part	nership assets?	H	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 re	guiariy traded on an established		X No
Part II Transferee Foreign Corporation Information (ego instructions)	Yes	A NO
4 Name of transferee (foreign corporation)	5a Identifying nu	mher if any	
Robotiq, Inc.	Ja luentilying hui	illiber, il aliy	
6 Address (including country)	5b Reference ID n	umber	
966, Chemin Olivier, Ste 500	(see instructions)		
Levis QC CA G7A2N1 Canada	(
7 Country code of country of incorporation or organization (see instruction CA	ons)		
8 Foreign law characterization (see instructions) Corporation			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
	_	000	

Part III Inform		ng Transfer of Property (see			0412	Page 4
Section A—Cash				•	4.6	
Type of property	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
Cash	transfer 11/29/18	property		date of transfer	basis	transfer
	emainder of Part III					X Yes No
Type of	(a) Date of	(b) Description of		(c) Fair market 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						
recognition agreer 12a Were any assets of foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to the transferer foreign If "Yes," continue to the transferor Including a branch Including In	ment was filed? of a foreign branch (n? 12b. r a domestic corpore th that is a foreign di to line 12c. If "No," s the transfer, was the corporation? to line 12d. If "No," s red loss amount incl	curities subject to section 367(a) with curities subject to section 367(a) with circles a foreign of ation that transferred substantially all isregarded entity) to a specified 10% skip lines 12c and 12d, and go to line e domestic corporation a U.S. share skip line 12d, and go to line 13. luded in gross income as required unescribed in section 367(d)(4)?	disregarde I of the as -owned fo e 13. holder wit	ed entity) transferred seets of a foreign bra preign corporation? The respect to the seed on 91 • \$	to a	YesNoYesNoYesNoYesNoYesNo
Section C—Intangib	le Property Subj	ect to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						1

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Attachment Sequence No. 128

Intern	al Revenue Service Attach to your income tax return f	or the year of the transfer or distr	ibution.	Se	quence	No. 1	128
Pa	rt I U.S. Transferor Information (see instructions)						
	of transferor enry County Community Foundation,		Identifying numb	er (s	ee instr	uction	s)
Ir	nc.		31-11704	12			
1	Is the transferee a specified 10%-owned foreign corporation that is not	a controlled foreign corporation?			Yes		No
2	If the transferor was a corporation, complete questions 2a through 2d. $ \\$						
а	If the transfer was a section $361(a)$ or (b) transfer, was the transferor c	ontrolled (under section 368(c)) by					
					Yes		No
b					Yes		No
	If not, list the controlling shareholder(s) and their identifying number(s).						
	Controlling shareholder	Identify	ing number				
	If the transferor was a member of an affiliated group filing a consolidate	•					
	corporation?			Ш	Yes		No
	If not, list the name and employer identification number (EIN) of the pa	rent corporation.					
	Name of parent corporation	EIN of pare	ent corporation				
d	Have basis adjustments under section 367(a)(4) been made?				Yes		No
	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership.	sferor (but is not treated as such und	der section 367),				
	Electine name and Envertine transfer of partitioning.						
	Name of partnership	EIN of p	partnership				
	Truebridge Capital Partners Fund V	82-2	022562				
b	Did the partner pick up its pro rata share of gain on the transfer of partner	nership 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 required by the same $\frac{1}{2}$	gularly traded on an established					
	securities market?				Yes	_X	No
	rt II Transferee Foreign Corporation Information (-					
4	Name of transferee (foreign corporation) SPT Pledge Co Limited	5	a Identifying nun	nber	, if any		
6	Address (including country)	5	b Reference ID ու	ımbe	er		
	Melbourne Science Park	(5	see instructions)				
	Hertfordshire UK SG8 6EE Great Britain	· · · · · · · · · · · · · · · · · · ·					
	Country code of country of incorporation or organization (see instructio UK	ns)					
8	Foreign law characterization (see instructions) Corporation						
9	Is the transferee foreign corporation a controlled foreign corporation? .				Yes	X	No
				~	30 ·-		

	ation Regard	ding Transfer of Property (see i	nstructi	ons)	<u> </u>	T ago I
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	09/24/18			190		
	emainder of Part	erred? t III and go to Part IV. than intangible property subject t				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						
recognition agreem 12a Were any assets of foreign corporation of "Yes," go to line of the waste transferor (including a branch of "Yes," continue to the transferee foreign of the waste transferee foreign of the waste transferor of the waste transferor to the waste tran	nent was filed? If a foreign branch 1? 12b. If a domestic corport that is a foreign In that i	o," skip line 12d, and go to line 13. included in gross income as required un	of the as owned fo 13. older wit	sets of a foreign brancing corporation?	nnch	Yes No Yes No Yes No Yes No Yes No
Section C—Intangible		ubject to Section 367(d)	1			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals				<u> </u>		

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Attachment Sequence No. 128

	for the year of the transfer or distribution.	Sequence No	o. 128
Part I U.S. Transferor Information (see instructions)			
Name of transferor Henry County Community Foundation,	Identifying num	·	ctions)
F D: 10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	controlled (under section 368(c)) by	Yes Yes Yes	No No No
Controlling shareholder	Identifying number		
c If the transferor was a member of an affiliated group filing a consolidate corporation? If not, list the name and employer identification number (EIN) of the particular consolidation.		. Yes	☐ No
Name of parent corporation	EIN of parent corporation		
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a Liet the page and EIN of the transferor's partnership. 	usferor (but is not treated as such under section 367),	Yes	☐ No
a List the name and EIN of the transferor's partnership. Name of partnership	EIN of partnership		
Truebridge Capital Partners Fund V b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market?	egularly traded on an established	Yes	X No X No
Part II Transferee Foreign Corporation Information			
4 Name of transferee (foreign corporation) Habana Labs LTD.	5a Identifying nu	mber, if any	
6 Address (including country) 5 Tarshish St Caesarea Indistrial Park IS Israel 7 Country code of country of incorporation or organization (see instruction	5b Reference ID n (see instructions)	number	
8 Foreign law characterization (see instructions) Corporation			
9 Is the transferee foreign corporation a controlled foreign corporation?		. Yes	X No

Form 926 (Rev. 11-2018) Henry County Community Foundation, 31-1170412

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Page	_

	ation Regar	ding Transfer of Property (see	instructi	ons)			
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	Gain recog	gnized on
Cash	10/31/1			132	Badio	tranc	<i>,</i> 101
	emainder of Par	erred? t III and go to Part IV. than intangible property subject		on 367(d))		X Yes	☐ No
	(a)	(b)	to section	(c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recog trans	nized on
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with built-in loss							
 Totals							
(including a branch of "Yes," continue to transferee foreign of "Yes," continue to the transferror of the transferor of	12b. r a domestic cor n that is a foreig o line 12c. If "N the transfer, wa corporation? o line 12d. If "N ed loss amount transfer propert	poration that transferred substantially a n disregarded entity) to a specified 10% o," skip lines 12c and 12d, and go to lines the domestic corporation a U.S. share o," skip line 12d, and go to line 13. included in gross income as required up described in section 367(d)(4)?	II of the as 6-owned fo e 13. Pholder wit	sets of a foreign bra preign corporation? h respect to the	<u>.</u>	Yes Yes Yes	No No No No
Section C—Intangib	le Property S	ubject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income ir for year of (see inst	nclusion
Property described in sec. 367(d)(4)							
Totals							

Form 926 (Rev. 11-2018)	Henry	County	Community	^r Foundati	on, 31-1170412
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orm 9	226 (Rev. 11-2018) Henry County Community Foundation, 31-1170412	Page 3
	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?	es No 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)?	es No
Supp	plemental Part III Information Required To Be Reported (see instructions)	
Part	IV Additional Information Regarding Transfer of Property (see instructions)	
	Transfer in the state of the st	
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) ▶	
18	Indicate whether any transfer reported in Part III is subject to any of the following.	
а		es X No
b		es X No
С	Recapture under section 1503(d)	es X No
d		es X No
19		es X No
20a		es 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	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 X No Form **926** (Rev. 11-2018)

No

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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

Intern	nal Revenue Service	► Attach to yo	ur income tax return	for the year of the transfer or di	istribution.	Se	quence l	No.	128
Pa	art I U.S. Tran	sferor Information	(see instructions)						
Name	e of transferor		,		Identifying num	ber (s	ee instri	uction	ıs)
He	enry County	Community Fo	oundation,						
I1	nc.				31-11704	<u> 12</u>			
1	Is the transferee a spo	ecified 10%-owned foreig	n corporation that is no	t a controlled foreign corporation?)		Yes		No
2	If the transferor was a	a corporation, complete qu	uestions 2a through 2d.						
а	If the transfer was a s	ection 361(a) or (b) trans	fer, was the transferor o	controlled (under section 368(c)) b	ру				
	five or fewer domestic	corporations?				. \square	Yes		No
b	Did the transferor rem	nain in existence after the	transfer?			. 🔲	Yes		No
	If not, list the controlling	ng shareholder(s) and the	eir identifying number(s).					
	C	controlling shareholder		Ident	tifying number				
С	If the transferor was a	member of an affiliated	group filing a consolidat	ted return, was it the parent					
·							Yes		No
	•					· Ш		ш	
	ii not, iist the name ar	nd employer identification	number (Env) or the pa	arent corporation.					
	Nai	me of parent corporatio	n	EIN of p	parent corporation				
d	Have basis adjustmer	nts under section 367(a)(4	4) been made?			. 🔲	Yes		No
,	If the transferor was a	nortnor in a nortnorchin	that was the actual tran	nsferor (but is not treated as such	under coetion 267)				
3	complete questions 3		ırıat was trie actual trair	isleror (but is not treated as such	under section 307),				
а		N of the transferor's partne	ership.						
			•						
		Name of partnership		EIN	of partnership				
	Truebridge (Capital Partr	ners Fund V	82-	2022562				
b	Did the partner pick u	p its pro rata share of gai	n on the transfer of par	tnership assets?			Yes	X	No
С	Is the partner disposir	ng of its entire interest in	the partnership?				Yes	X	No
d	Is the partner disposir	ng of an interest in a limite	ed partnership that is re	egularly traded on an established					
	securities market?						Yes	X	No
Pa	art II Transfere	ee Foreign Corpora	tion Information ((see instructions)					
4	Name of transferee (f	oreign corporation)			5a Identifying nu	mbei	r, if any		
	GS Pledge	Co Limited							
6	Address (including co				5b Reference ID n	umbe	er		
	Ashley Road Altr	• •	WA14 2 DT		(see instructions)				
	Cheshire	UK	Great Britain	n (UK)	<u> </u>				
7	Country code of coun	try of incorporation or org	anization (see instruction	ons)			_		
	UK		<u> </u>						
8	Foreign law character	rization (see instructions)							
	Corporation								
9			ed foreign corporation?			. 🔲	Yes	X	No

Form 926 (Rev. 11-2018)		ounty Community Fou			0412	Page 2
	ation Regard	ling Transfer of Property (see	instructi	ons)		
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	12/27/18	property		357	baolo	transier
	emainder of Part	III and go to Part IV.		207/41)		X Yes No
		than intangible property subject	to section		/d\	(a)
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 b Was the transfero (including a branch If "Yes," continue to c Immediately after transferee foreign If "Yes," continue to d Enter the transferr	of a foreign branch n? 12b. r a domestic corporation of that is a foreign to line 12c. If "No, the transfer, was corporation? to line 12d. If "No, red loss amount in transfer property	," skip line 12d, and go to line 13. ncluded in gross income as required ur described in section 367(d)(4)?	I of the as -owned fo e 13. holder wit	ssets of a foreign bra preign corporation? th respect to the	nch	Yes No Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Su	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Attachment Sequence No. 128

Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Truebridge Capital Partners Fund V **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) 5a Identifying number, if any LN Pledge Co Limited 98-1439096 5b Reference ID number Address (including country) 6 Coke Lane Smithfield (see instructions) EI D07 EDP2 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation Is the transferee foreign corporation a controlled foreign corporation? Yes

		g Transfer of Property (see			0412	Page 4
Section A—Cash	ation Regardin	g Transfer of Property (see	nstructi	ons)		
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	05/24/18			237		
	emainder of Part III					X Yes No
Type of property	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
Stock and	transfer	property		date of transfer	basis	transfer
securities Inventory						
inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
recognition agreem 12a Were any assets of foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to the transferee foreign If "Yes," continue to the transferor of the transfer	nent was filed? of a foreign branch (n? 12b. a domestic corpora that is a foreign di o line 12c. If "No," s the transfer, was the corporation? o line 12d. If "No," s ed loss amount inclute transfer property de in C and questions "		disregarde	ed entity) transferred seets of a foreign bra preign corporation? th respect to the	to a	Yes No Yes No Yes No Yes No Yes No
Section C—intangible	(a)	(b)	(c)	(d)	(e)	(f)
Type of property	Date of transfer	Description of property	Useful life	Arm's length price on date of transfer	Cost or other basis	Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totala						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	No

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

Sequence No. 128

Attachment

Pa	rt I U.S. Transferor Information (see instructions)		
	of transferor		Identifying number (see instructions)
He	enry County Community Foundation,		
	nc.		31-1170412
	Is the transferee a specified 10%-owned foreign corporation that is not	a controlled foreign corporation?	Yes No
	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 of	controlled (under section 368(c)) by	
			Yes No
	If not, list the controlling shareholder(s) and their identifying number(s)		
	Controlling shareholder	Identifyi	ing number
	If the transferor was a member of an affiliated group filing a consolidat		
	corporation?		Yes No
	If not, list the name and employer identification number (EIN) of the pa		
	in not, list the name and employer identification number (Env) of the pa	rent corporation.	
	Name of parent corporation	<u>'</u>	ent corporation
	Name of parent corporation	EIN of pare	
		EIN of pare	
d 3	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d.	EIN of pare	Yes No
d 3	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran	EIN of pare	Yes No
d 3	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d.	EIN of pare	Yes No
d 3	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	EIN of pare	Yes No
d 3 a	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	EIN of pare	Yes No
d 3 a	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership	EIN of pare	Yes No ler section 367), partnership
d 3 a	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Cruebridge Capital Partners Fund V	EIN of pare	Yes No ler section 367), partnership
d 3 a	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Pruebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is re	EIN of pare steed as such und EIN of	Yes No
d 3 a b c d	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Pruebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market?	EIN of pare sferor (but is not treated as such und EIN of pare service) 82-20 nership assets?	Yes No
d 3 a	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Pruebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is re	EIN of pare steel as such und EIN of	Yes No
d 3 a	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Pruebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is re securities market? Transferee Foreign Corporation Information (EIN of pare steel as such und EIN of	Yes No Noter section 367), Partnership D22562 Yes X No Yes X No
d 3 a D C d Pa 4	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Pruebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is re securities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation)	EIN of pare sferor (but is not treated as such und EIN of p 82-20 nership assets? gularly traded on an established see instructions)	Yes No Noter section 367), Partnership D22562 Yes X No Yes X No
d 3 a D C d Pa 4	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Pruebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Robotiq, Inc.	EIN of pare sferor (but is not treated as such und EIN of p 82-20 nership assets? gularly traded on an established see instructions) 5a	Yes No
d 3 a D C d Pa 4	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Pruebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is re securities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Robotig, Inc. Address (including country)	EIN of pare sferor (but is not treated as such und EIN of p 82-20 nership assets? gularly traded on an established see instructions) 5a	Yes No
d 3 a Pa 4 6	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Pruebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? I Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Robotiq, Inc. Address (including country) 966 Chemin Olivier, Ste 500	EIN of pare sferor (but is not treated as such und EIN of p 82-20 nership assets? gularly traded on an established see instructions) 56 (s	Yes No
d 3 a b c d Pa 4 6	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Pruebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? ITransferee Foreign Corporation Information (Name of transferee (foreign corporation) Robotiq, Inc. Address (including country) 966 Chemin Olivier, Ste 500 Levis QC CA G7A 2N1 Canada Country code of country of incorporation or organization (see instruction CA) Foreign law characterization (see instructions)	EIN of pare sferor (but is not treated as such und EIN of p 82-20 nership assets? gularly traded on an established see instructions) 56 (s	Yes No
d 3 a Pa 4 6 7 8	Name of parent corporation Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Pruebridge Capital Partners Fund V Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? I Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Robotiq, Inc. Address (including country) 966 Chemin Olivier, Ste 500 Levis QC CA G7A 2N1 Canada Country code of country of incorporation or organization (see instruction)	EIN of pares sferor (but is not treated as such und EIN of p 82-20 nership assets? gularly traded on an established see instructions) 5a 5i (s	Partnership D22562 Yes X No Yes X No Yes X No A Identifying number, if any D Reference ID number Here instructions)

Part III Informa		unty Community Four ng Transfer of Property (see			0412	Page 2
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	11/29/18			285		
10 Was cash the only If "Yes," skip the re	emainder of Part III	and go to Part IV.				∴ X Yes No
Section B—Other Pro		an intangible property subject	to section		(-1)	(-)
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						
recognition agreem 12a Were any assets of foreign corporation of "Yes," go to line of the waste transferor (including a branch of "Yes," continue to the waste transferee foreign of the waste transferee foreign of the waste transferree foreign of the waste foreign of	nent was filed? If a foreign branch (12b. If a domestic corporation that is a foreign di If io line 12c. If "No," so If the transfer, was the corporation? If io line 12d. If "No," so If io line 12d. If "No," so	skip line 12d, and go to line 13. luded in gross income as required ur escribed in section 367(d)(4)? 14a through 15.	l of the as -owned for a 13. holder with	ed entity) transferred esets of a foreign bra preign corporation? h respect to the	inch	Yes No Yes No Yes No Yes No Yes No
Section C—Intangibl		ect to Section 367(d)	1	T T		100
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
` , , ,						
Totalo						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ц	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Sequence No. 128

Attachment

Internal	Revenue Service Attach to your income tax return for t	he year of the transfer or distribution.	Se	quence	No. 128
Part	U.S. Transferor Information (see instructions)				
	f transferor nry County Community Foundation,	Identifying nu	nber (see insti	ructions)
Inc	3.	31-1170	412	i I	
1 Is	the transferee a specified 10%-owned foreign corporation that is not a c	ontrolled foreign corporation?	[Yes	No
2 If	the transferor was a corporation, complete questions 2a through 2d.				
a If	the transfer was a section 361(a) or (b) transfer, was the transferor contra	rolled (under section 368(c)) by			
fiv	ve or fewer domestic corporations?		[Yes	No
			[Yes	No
lf	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 r	eturn, was it the parent			
C	orporation?	· · · · · · · · · · · · · · · · · · ·	[Yes	No
If	not, list the name and employer identification number (EIN) of the parent	corporation	_		
	Name of parent corporation	EIN of parent corporation			
d H	ave basis adjustments under section 367(a)(4) been made?		[Yes	No
C	the transferor was a partner in a partnership that was the actual transferomplete questions 3a through 3d. ist the name and EIN of the transferor's partnership.	or (but is not treated as such under section 367),			
	Name of partnership	EIN of partnership			
Tr	ruebridge Capital Partners Fund V	82-2022562			
b D	id the partner pick up its pro rata share of gain on the transfer of partners	ship 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 regula	rly traded on an established			
Se	ecurities market?			Yes	X No
Part		e instructions)			
	ame of transferee (foreign corporation) BPT Pledgeco Limited	5a Identifying n	umbe	r , if any	1
6 A	ddress (including country)	5b Reference ID	numb	er	
М	elbourne Science Park	(see instructions)			
н	erfordshire UK SG8 6EE Great Britain (U	JK)			
	ountry code of country of incorporation or organization (see instructions)				
	oreign law characterization (see instructions) Corporation			1	
9 Is	the transferee foreign corporation a controlled foreign corporation?			Yes	X No

	ation Regard	ding Transfer of Property (see i	nstructi	ons)	<u> </u>	T ago I
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	09/24/18			190		
	emainder of Part	erred? t III and go to Part IV. than intangible property subject t				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						
recognition agreem 12a Were any assets of foreign corporation of "Yes," go to line of the waste transferor (including a branch of "Yes," continue to the waste transferee foreign of the waste transferee foreign of the waste transferor of the wast	nent was filed? If a foreign branch 12. If a domestic corporation that is a foreign In that i	o," skip line 12d, and go to line 13. included in gross income as required un	of the as owned fo 13. older wit	sets of a foreign brancing corporation?	nnch	Yes No Yes No Yes No Yes No Yes No
Section C—Intangible		ubject to Section 367(d)	1			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals				<u> </u>		

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Attachment Sequence No. 128

Intern	al Revenue Service	Attach to your income tax return	for the year of the transfer or dis	tribution.	Se	quence	No.	<u> 128</u>
Pa	rt I U.S. Tran	nsferor Information (see instructions)						
	e of transferor enry County	Community Foundation,		Identifying num	ber (s	see instr	uction	ns)
Iı	nc.			31-11704	12			
а	If the transferor was a sifty or fewer domestic Did the transferor rem		controlled (under section 368(c)) by			Yes Yes Yes		No No No
	c	Controlling shareholder	Identi	fying number				
	corporation?	a member of an affiliated group filing a consolidat	·		. [Yes		No
	Nai	me of parent corporation	EIN of pa	arent corporation				
						1		
3	If the transferor was a complete questions 3	nts under section 367(a)(4) been made?	nsferor (but is not treated as such u			Yes		No
		Name of partnership	EIN o	f partnership				
7	Adamas Oppo	rtunities, L.P.	04-	3514360				
b c	Did the partner pick u	ip its pro rata share of gain on the transfer of paring of its entire interest in the partnership? ng of an interest in a limited partnership that is re	tnership assets?	3314300		Yes Yes	X X	No No
Pa		ee Foreign Corporation Information ((see instructions)					
4	Name of transferee (f			5a Identifying nu	mbe	r, if any		
	Address (including co Clifton House 75 George Town Country code of coun	puntry)		5b Reference ID n (see instructions)	umb	er		
8	Foreign law character Corporation	rization (see instructions)						
9		ign corporation a controlled foreign corporation?				Yes	X	No

Page	2

	ation Regardin	g Transfer of Property (see	instructi	ons)		
Section A—Cash	(a)	(b)		(c)	(d)	(e)
Type of property	Date of	Description of		(c) Fair market value on	Cost or other	Gain recognized on
	transfer 11/13/18	property		date of transfer	basis	transfer
Cash	11/13/10			35		
10 Was cash the only If "Yes," skip the re	r property transferred emainder of Part III a					X Yes No
Section B—Other Pr	operty (other tha	n intangible property subject	to section	on 367(d))		
Type of	(a) Date of	(b) Description of		(c)	(d)	(e)
property	transfer	property		Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Stock and						
securities						
Inventory						
Other property						
(not listed under						
another category)						
Dranarty with						
Property with built-in loss						
Totals						
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue t c Immediately after t transferee foreign If "Yes," continue t d Enter the transferor 13 Did the transferor	n? 12b. r a domestic corpora n that is a foreign dis to line 12c. If "No," sl the transfer, was the corporation? to line 12d. If "No," sl ed loss amount inclu	tion that transferred substantially a sregarded entity) to a specified 10% cip lines 12c and 12d, and go to line domestic corporation a U.S. share kip line 12d, and go to line 13. Ided in gross income as required useribed in section 367(d)(4)?	II of the as 6-owned for e 13. Pholder wit	sets of a foreign bra preign corporation? h respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Subje	ect to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
						,
Duamanti e daganiha d						
Property described						
in sec. 367(d)(4)						
Totals						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ц	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Attachment Sequence No. 128

Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) 5a Identifying number, if any Apexc 2018-2A Sub 10/20/31 Address (including country) 5b Reference ID number Clifton House 75 Fort St (see instructions) CJ KY1-1108 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation

Is the transferee foreign corporation a controlled foreign corporation?

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Page	_

	ation Regar	ding Transfer of Property (see	instructi	ons)			
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	Gain recog	gnized on
Cash	11/13/1			16	Bucic	trans	<i>7</i> 101
	emainder of Par	t III and go to Part IV.				X Yes	☐ No
		than intangible property subject	to section		(4)	1 (0	
Type of property	(a) Date of transfer	(b) Description of property		(c) Fair market value on date of transfer	(d) Cost or other basis	Gain reco trans	gnized on
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with built-in loss							
Totals							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to c Immediately after transferee foreign If "Yes," continue to d Enter the transferor If "No," skip Section	of a foreign branch? 12b. r a domestic conthithet is a foreign to line 12c. If "Nother transfer, wa corporation? to line 12d. If "Nothed loss amount transfer propertion C and question?	o," skip line 12d, and go to line 13. included in gross income as required uy described in section 367(d)(4)?ons 14a through 15.	ill of the as 6-owned fo e 13. eholder wit	ssets of a foreign bra preign corporation? h respect to the	nch	Yes Yes Yes Yes Yes	No No No No No
Section C—Intangib	le Property S	ubject to Section 367(d)				1	
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income in for year o (see ins	nclusion
						+	
Property described							
in sec. 367(d)(4)							
Totals						_	

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottons)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	No

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

Sequence No. 128

Attachment

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is 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	
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	Yes No
	<i>)</i> .
Controlling shareholder	Identifying number
-	
c If the transferor was a member of an affiliated group filing a consolida	·
corporation?	Yes No
If not, list the name and employer identification number (EIN) of the pa	arent 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 tran	nsferor (but is not treated as such under section 367).
complete questions 3a through 3d.	, , , , , , , , , , , , , , , , , , ,
a List the name and CIN of the transferor's partnership	
a List the name and EIN of the transferor's partnership.	
	EIN of partnership
Name of partnership	EIN of partnership
Name of partnership	
Name of partnership Adamas Opportunities, L.P.	04-3514360
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of par	tnership assets? Yes X No
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of parc ls the partner disposing of its entire interest in the partnership?	04-3514360 tnership assets? Yes X No Yes X No
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 reference.	tnership assets? Yes X No Yes X No egularly traded on an established
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market?	tnership assets? Yes X No Yes X No egularly traded on an established Yes X No
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information	thership assets? to yes
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market?	tnership assets? Yes X No Yes X No egularly traded on an established Yes X No
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of par 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation)	thership assets? to yes
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Ares 2016-9A Sub/07/18/2028	tnership assets? Yes X No Yes X No egularly traded on an established Yes X No (see instructions) 5a Identifying number, if any
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Ares 2016-9A Sub/07/18/2028 6 Address (including country)	thership assets? the stablished and established are instructions) The stablished are instructions are instructions.
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Ares 2016-9A Sub/07/18/2028 6 Address (including country) Clifton House, 75 Fort Street George Town CJ KY1-1108 Cayman Island 7 Country code of country of incorporation or organization (see instructions)	thership assets? the stablished and established are instructions) The stablished are instructions are instructions.
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of par 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Ares 2016-9A Sub/07/18/2028 6 Address (including country) Clifton House, 75 Fort Street George Town CJ KY1-1108 Cayman Island 7 Country code of country of incorporation or organization (see instruction)	thership assets? the stablished and established traded on an establish
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Ares 2016-9A Sub/07/18/2028 6 Address (including country) Clifton House, 75 Fort Street George Town CJ KY1-1108 Cayman Island 7 Country code of country of incorporation or organization (see instructions) 8 Foreign law characterization (see instructions)	thership assets? the stablished and established are instructions) The stablished are instructions are instructions.
Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of par 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 resecurities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) Ares 2016-9A Sub/07/18/2028 6 Address (including country) Clifton House, 75 Fort Street George Town CJ KY1-1108 Cayman Island 7 Country code of country of incorporation or organization (see instruction)	tnership assets? tnership assets? Tyes X No Yes X No egularly traded on an established Yes X No (see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)

	ation Regard	ding Transfer of Property (see	instructi	ons)		r ago .
Section A—Cash	(a)	(b)		(c)	(d)	(e)
Type of property	Date of transfer	Description of		Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Cash	02/06/18	property		69	Dasis	tialisiei
	emainder of Part	erred? III and go to Part IV. than intangible property subject				X Yes No
Type of	(a)	(b)		(c)	(d)	(e)
property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Stock and						
securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Duilt-iii ioss						
Totals						
recognition agreem 12a Were any assets of foreign corporation of "Yes," go to line of the waste transferor (including a branch of "Yes," continue to the waste transferee foreign of the waste transferee foreign of the waste transferor that the transferor to the waste transferor that the waste transferor	nent was filed? f a foreign branc ? 12b. a domestic corp that is a foreigr o line 12c. If "No he transfer, was corporation? o line 12d. If "No ed loss amount i rransfer property n C and question	o," skip line 12d, and go to line 13. ncluded in gross income as required un described in section 367(d)(4)? ns 14a through 15.	lisregarde l of the as -owned fo 13. nolder wit	ed entity) transferred esets of a foreign bra preign corporation? h respect to the	to a	Yes No Yes No Yes No Yes No Yes No Yes No
Section C—Intangibl		ubject to Section 367(d)	1	I I		(5)
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totala						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	No

Return by a U.S. Transferor of Property to a Foreign Corporation

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Attachment

Sequence No. 128 Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?.. Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) 5a Identifying number, if any Atrium XIII Address (including country) 5b Reference ID number Clifton House 75 Fort St (see instructions) CJ KY1-1108 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation

Is the transferee foreign corporation a controlled foreign corporation?

Part III Information A—Cash	ation Regardi	ng Transfer of Property (see	Instructi	ons)		
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	05/17/18	, , ,		7		
10 Was cash the only If "Yes," skip the re	emainder of Part III					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						
recognition agreem 12a Were any assets of foreign corporation of "Yes," go to line of the waste transferor (including a branch of "Yes," continue to the waste transferee foreign of the "Yes," continue to the waste transferee foreign of the waste transferee foreign of the waste transferor that the transferor that the transferor that the waste was	nent was filed? if a foreign branch ? 12b. a domestic corpor that is a foreign c o line 12c. If "No," he transfer, was the corporation? o line 12d. If "No," ed loss amount incompanate property d n C and questions	ration that transferred substantially aldisregarded entity) to a specified 10% skip lines 12c and 12d, and go to line domestic corporation a U.S. share skip line 12d, and go to line as to line 13c and 12d, and go to line 13c and go to line 1	l of the as -owned fo e 13. holder wit	ed entity) transferred ssets of a foreign bra preign corporation? th respect to the	to a	Yes No Yes No Yes No Yes No Yes No Yes No
Section 6—intangibi	(a)	(b)	(c)	(d)	(e)	(f)
Type of property	Date of transfer	Description of property	Useful life	Arm's length price on date of transfer	Cost or other basis	Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Attachment Sequence No. 128

Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) 5a Identifying number, if any ATRM 9A-Sub 02/28/2047 Address (including country) 5b Reference ID number Clifton House 75 Fort St (see instructions) CJ KY1-1108 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation Is the transferee foreign corporation a controlled foreign corporation? Yes

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Part III Inform Section A—Cash	ation Regard	ding Transfer of Property (see	instruction	ons)		
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	05/14/18			11		
10 Was cash the only If "Yes," skip the re		rred? III and go to Part IV.				X Yes No
Section B—Other Pr		than intangible property subject	to section	on 367(d))		
Type of property	(a) Date of transfer	(b) Description of property	1	(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 b Was the transferor (including a branch If "Yes," continue t c Immediately after transferee foreign If "Yes," continue t d Enter the transfer	n? 12b. r a domestic corp h that is a foreign to line 12c. If "No the transfer, was corporation? to line 12d. If "No ed loss amount it	," skip line 12d, and go to line 13. ncluded in gross income as required ur described in section 367(d)(4)?	l of the as -owned fo e 13. holder wit	ssets of a foreign bra preign corporation? h respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Su	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		Na
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	covered by section 367(e)(1)? See instructions		Yes	X	Nο

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

Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?.. Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any Brugodati SL Address (including country) 5b Reference ID number 9 Calle Zurbaran (see instructions) SP 28101 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation

Is the transferee foreign corporation a controlled foreign corporation?

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	ation Regard	ling Transfer of Property (see	instructi	ons)		
Section A—Cash Type of property	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
Cash	transfer 12/20/19	property		date of transfer	basis	transfer
10 Was cash the only If "Yes," skip the re	emainder of Part	III and go to Part IV.				X Yes No
	operty (other to (a)	than intangible property subject (b)	to section	on 367(d)) (c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	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 b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to d Enter the transferor	n? 12b. 1a domestic corp 1 that is a foreign 1 line 12c. If "No 1 the transfer, was 1 corporation? 1 line 12d. If "No	," skip line 12d, and go to line 13. ncluded in gross income as required ur described in section 367(d)(4)?	l of the as -owned for e 13. holder wit	ssets of a foreign brai preign corporation? h respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangible	le Property Su	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						
i otalo				<u> </u>		<u>i</u>

	Form 926 (Rev. 11-2018)	Henry	County	Community	Foundation,	31-1170412
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140	Did the transferor transfer any intensible preparty that, at the time of the transfer, had a useful life				
144	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
h			Yes	\vdash	No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section	Ш	162		NO
С	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	Ш	res		NO
u	•				
	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) ▶ \$				
45	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any				
15			Vaa		N ₀
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Ш	Yes		No
Suni	plemental Part III Information Required To Be Reported (see instructions)				
Оирі	picinental Falt in information required to be reported (500 mondottono)				
Part	IV Additional Information Regarding Transfer of Property (see instructions)				
ıaıı	Additional information Regarding Transfer of Property (acc instructions)				
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.				
10	(a) Before % (b) After %				
47					
17	Type of nonrecognition transaction (see instructions)				
18	Indicate whether any transfer reported in Part III is subject to any of the following.			77	
a	Gain recognition under section 904(f)(3)		Yes	X	No
b	Gain recognition under section 904(f)(5)(F)		Yes		No
С	Recapture under section 1503(d)		Yes		No
d	Exchange gain under section 987		Yes	X	No
19	Did this transfer result from a change in entity classification?		Yes	X	No
20a			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	Did the domestic corporation not recognize gain or loss on the distribution of property because the				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes		No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			ш	
	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

Attachment Sequence No. 1

		or the year of the transfer or distribution.	Ocque	nce N	
	art I U.S. Transferor Information (see instructions)	T.			
	e of transferor	Identifying numb	er (see	instruc	tions)
	enry County Community Foundation,	24 44 70 4			
Iı	nc.	31-11704			
1	Is the transferee a specified 10%-owned foreign corporation that is no	- ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '	Y	es	No
	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 of	controlled (under section 368(c)) by			
			\vdash	es	No
b			Y	es	No
	If not, list the controlling shareholder(s) and their identifying number(s)) .			
	Out of the state o	Discrete Communication of the			
	Controlling shareholder	Identifying number			
С	If the transferor was a member of an affiliated group filing a consolidat	ed return, was it the parent			
	corporation?		Y	es	No
	If not, list the name and employer identification number (EIN) of the pa				
	in not, list the name and employer identification number (Liny) of the pa	irent corporation.			
	No. 10 feet and 10	FINE of a section of the section			
	Name of parent corporation	EIN of parent corporation			
d	Have basis adjustments under section 367(a)(4) been made?				
			Y	es	No
,	If the transferor was a partner in a partnership that was the actual tran		Y	es	No
3	If the transferor was a partner in a partnership that was the actual tran		Y	es	No No
	complete questions 3a through 3d.		Y	es	No No
	complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	sferor (but is not treated as such under section 367),	Y	es	No No
	complete questions 3a through 3d.		Y	es	No No
	complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	sferor (but is not treated as such under section 367),	Y	es	No No
<u>a</u>	complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	sferor (but is not treated as such under section 367),	Y	es	No No
a 2	complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P.	sferor (but is not treated as such under section 367), EIN of partnership 04-3514360			
а <u>2</u> b	complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of partnership	sferor (but is not treated as such under section 367), EIN of partnership 04-3514360	Y	es	X No
a b c	complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P.	EIN of partnership 04-3514360 nership assets?	Y	es	X No
a b c	complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is re	EIN of partnership 04-3514360 mership assets? gularly traded on an established	Y	es es	X No X No
a b c d	complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market?	EIN of partnership 04-3514360 nership assets? gularly traded on an established	Y	es es	X No
a b c d	complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions)	Y(es es	X No X No
a b c d	complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market?	EIN of partnership 04-3514360 nership assets? gularly traded on an established	Y(es es	X No X No
a b c d	complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Cathedral Lake II, Ltd	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions)	Your Your State of the state of	es es	X No X No
a b c d	complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation)	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions) 5a Identifying num	Your Your State of the state of	es es	X No X No
a b c d	Complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Cathedral Lake II, Ltd Address (including country) PO Box 1093	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions) 5a Identifying num (see instructions)	Your Your State of the state of	es es	X No X No
a b c d	CJ KY1-1102 Cayman Island Name of partnership. L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Cathedral Lake II, Ltd Address (including country) PO Box 1093 Grand Cayman CJ KY1-1102 Cayman Island	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions) 5a Identifying num (see instructions)	Your Your State of the state of	es es	X No X No
a b c d	Complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Cathedral Lake II, Ltd Address (including country) PO Box 1093	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions) 5a Identifying num (see instructions)	Your Your State of the state of	es es	X No X No
a b c d Pa 4 6	Country code of country of incorporation or organization (see instruction CJ	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions) 5a Identifying num (see instructions)	Your Your State of the state of	es es	X No X No
a b c d Pa 4 6	Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Cathedral Lake II, Ltd Address (including country) PO Box 1093 Grand Cayman CJ KY1-1102 Cayman Island Country code of country of incorporation or organization (see instruction)	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions) 5a Identifying num (see instructions)	Your Your State of the state of	es es	X No X No

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Part III Inform	ation Rega	rding Transfer of Property (see	instructio	ons)			
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 recogniz transfer	
Cash	10/26/1	-8		1			
	emainder of Pa	rt III and go to Part IV.				X Yes	No
	operty (otne (a)	r than intangible property subject t	to section	on 367(d)) (c)	(d)	(e)	
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recogniz 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 b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	of a foreign brain? 12b. If a domestic contract is a foreign of line 12c. If "Nation of line 12d. If "Nation of line of loss amount transfer proper	proporation that transferred substantially all gn disregarded entity) to a specified 10%-No," skip lines 12c and 12d, and go to line as the domestic corporation a U.S. sharehoo," skip line 12d, and go to line 13. It included in gross income as required unity described in section 367(d)(4)?	of the as- owned for 13. nolder with	ed entity) transferred sets of a foreign bra breign corporation? h respect to the	to a nch	Yes [No No No No No
Section C—Intangibl	le Property S	Subject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclu for year of tra (see instruc	ansfer
Property described in sec. 367(d)(4)							
 Totals						+	
1 01010				l			

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	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.		
47	(a) Before % (b) After %		
17	Type of nonrecognition transaction (see instructions)		
18	Indicate whether any transfer reported in Part III is subject to any of the following.	□ v.	V N
a	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No

Recapture under section 1503(d)

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

19

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

Sequence No. 128

Attachment

Internal Revenue Service	► Attach to your income tax return	for the year of the transfer or dis	tribution.	Sec	uence l	No. 1	128
Part I U.S. Tra	nsferor Information (see instructions)						
Name of transferor	. Communitar Rosendation		Identifying numb	oer (s	ee instru	ıction	s)
Inc.	Community Foundation,		31-11704	1 2			
 Is the transferee a sp If the transferor was If the transfer was a five or fewer domest Did the transferor rei 	i ii4	controlled (under section 368(c)) by	/		Yes Yes Yes		No No No
	Controlling shareholder	Identi	fying number				
corporation?	a member of an affiliated group filing a consolidat	·			Yes		No
·	ame of parent corporation		arent corporation				
al Haya basis adiyatas	anta conder acation 207/aV/A) have made 2				Vaa		NI.
3 If the transferor was complete questions 3	ents under section 367(a)(4) been made?	sferor (but is not treated as such u			Yes		No
	Name of partnership	EIN o	f partnership				
Adamas Oppo	ortunities, L.P.	04-1	3514360				
b Did the partner pickc Is the partner dispos	up its pro rata share of gain on the transfer of parting of its entire interest in the partnership?ing of an interest in a limited partnership that is re	tnership assets?			Yes Yes Yes	X	No No
	ree Foreign Corporation Information (see instructions)					.10
4 Name of transferee (5a Identifying nur	nber	, if any		
CATLK 2013	-1A Sub 10/15/2029			·			
6 Address (including of PO Box 1093 Grand Cayman 7 Country code of court	ountry) CJ KY1-1102 Cayman Island ntry of incorporation or organization (see instruction	-	5b Reference ID not (see instructions)	umbe	r		
CJ	•						
Corporatio					V-	37	NI -
9 Is the transferee fore	eign corporation a controlled foreign corporation?				Yes	X	No

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Page	_

Part III Inform	ation Regard	ling Transfer of Property (see	instructi	ons)		
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	05/31/18			3		
	emainder of Part	rred? Ill and go to Part IV. than intangible property subject				X Yes No
Type of property	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
Stock and	transfer	property		date of transfer	basis	transfer
securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						_
Totals						
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to c Immediately after t transferee foreign If "Yes," continue to d Enter the transferor	of a foreign brance 1? 12b. a domestic corporation that is a foreign o line 12c. If "No he transfer, was corporation? o line 12d. If "No ed loss amount in	oration that transferred substantially all disregarded entity) to a specified 10%, skip lines 12c and 12d, and go to line the domestic corporation a U.S. sharel skip line 12d, and go to line 13. Included in gross income as required ur described in section 367(d)(4)?	lisregarde I of the as -owned for 13. holder wit	ed entity) transferred seets of a foreign bra preign corporation? th respect to the	to anch	
Section C—Intangible		bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
		Ш	
Sup	plemental Part III Information Required To Be Reported (see instructions)		
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
	(a) Before % (b) After %		
17	Type of nonrecognition transaction (see instructions)		

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

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

Indicate whether any transfer reported in Part III is subject to any of the following.

Did this transfer result from a change in entity classification?

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

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 Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

Yes

Yes

X No

No

No

No

No

X No

X

X No

X

X

18

b

d

b

21

If "Yes," complete lines 20b and 20c.

19

Form **926**(Rev. November 2018)
Department of the Treasury

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. 1

Pa	rt I U.S. Transferor Information (see instructions)	for the year of the transfer or disti	ibution. Sec	uence	NO. I	20
	of transferor		Identifying number (s	oo inetri	uctions	
	enry County Community Foundation,		identifying flumber (5	ee maa	uciions	,
	nc.		31-1170412			
	Is the transferee a specified 10%-owned foreign corporation that is not	t a controlled foreign corporation?		Yes		No
	If the transferor was a corporation, complete questions 2a through 2d.	• •			Ш -	
	If the transfer was a section 361(a) or (b) transfer, was the transfer or					
				Yes		No
				Yes		No
	If not, list the controlling shareholder(s) and their identifying number(s)		······			
	Controlling shareholder	Identify	ring number			
С	If the transferor was a member of an affiliated group filing a consolidat	ed return, was it the parent				
	corporation?	-		Yes		No
	If not, list the name and employer identification number (EIN) of the pa	arent corporation				
	The title fame and employer identification frames (Emy) or the pe	non corporation.				
	Name of parent corporation	FIN of par	ent corporation			
	rame of parent corporation	o. pa.	one oor poration			
d	Have basis adjustments under section 367(a)(4) been made?			Yes		No
					Ш.	
	If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d.	steror (but is not treated as such un	der section 367),			
	List the name and EIN of the transferor's partnership.					
	Name of partnership	EIN of	partnership			
	Adamas Opportunities, L.P.		<u>514360</u>			
	Did the partner pick up its pro rata share of gain on the transfer of part	nership assets?		Yes		No
	Is the partner disposing of its \textbf{entire} interest in the partnership? $\dots\dots$			Yes	X	No
	Is the partner disposing of an interest in a limited partnership that is re	- -				
	securities market?	and instructions)		Yes	ΧI	<u> 10</u>
	Transferee Foreign Corporation Information (Name of transferee (foreign corporation)	-	a Idontifying number	if ony		
4	CATLK 2015-2A Sub 07/16/2029		a Identifying number	, ii any		
6	Address (including country)		b Reference ID number	.r		
-	PO Box 1093		see instructions)	•		
	Grand Cayman CJ KY1-1102 Cayman Island	,				
7	Country code of country of incorporation or organization (see instruction	•				
	CJ					
8	Foreign law characterization (see instructions)					
	Corporation					
9	Is the transferee foreign corporation a controlled foreign corporation?			Yes	ΧI	No

_	•
Page	_

	ation Regard	ling Transfer of Property (see	instructi	ons)		
Section A—Cash Type of property	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
Cash	transfer C	property		date of transfer	basis	transfer
	emainder of Part	III and go to Part IV.				X Yes No
	operty (other t	than intangible property subject (b)	to section	on 367(d)) (c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	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 b Was the transferor (including a branch If "Yes," continue t c Immediately after transferee foreign If "Yes," continue t d Enter the transferr	n? 12b. r a domestic corp h that is a foreign to line 12c. If "No the transfer, was corporation? to line 12d. If "No ed loss amount in transfer property	," skip line 12d, and go to line 13. ncluded in gross income as required u described in section 367(d)(4)?	all of the as 6-owned for e 13. eholder wit	esets of a foreign brain preign corporation? The respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Su	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Droporty described						
Property described in sec. 367(d)(4)						
550. 501 (4)(4)						
Totala						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. November 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

Sequence No. 128

Attachment

Part I U.S. Transferor Information (see instruction	ns)	
Name of transferor		Identifying number (see instructions)
Henry County Community Foundation	,	
Inc.		31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that		Yes No
2 If the transferor was a corporation, complete questions 2a through		
a If the transfer was a section 361(a) or (b) transfer, was the transf	eror controlled (under section 368(c)) by	
	,	Yes No
If not, list the controlling shareholder(s) and their identifying num	per(s).	
Controlling shareholder	Identify	ring number
c If the transferor was a member of an affiliated group filing a cons corporation?		Yes No
If not, list the name and employer identification number (EIN) of t	he parent corporation	
	To parent corporation.	
Name of parent corporation		rent corporation
Name of parent corporation d Have basis adjustments under section 367(a)(4) been made?	EIN of par	
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. 	EIN of par	Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	EIN of par	Yes No No der section 367),
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. 	EIN of par	Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	EIN of par	Yes No No der section 367),
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P.	EIN of par	Yes No No der section 367), partnership 514360
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of	EIN of par	Yes No der section 367), partnership 514360 Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P.	EIN of par	Yes No No der section 367), partnership 514360
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of its the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that securities market?	EIN of par I transferor (but is not treated as such und EIN of 04-3 If partnership assets?	Yes No der section 367), partnership 514360 Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership tha	EIN of par I transferor (but is not treated as such und EIN of 04-3 If partnership assets?	Yes No der section 367), partnership 514360 Yes X No Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of its the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that securities market?	EIN of par I transferor (but is not treated as such und EIN of 04-3 If partnership assets? It is regularly traded on an established on (see instructions)	Yes No der section 367), partnership 514360 Yes X No Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of a list the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that securities market? Part II Transferee Foreign Corporation Information	EIN of par I transferor (but is not treated as such under EIN of the second of treated as such under transferor (but is not treated as such under transfer	Yes No der section 367), partnership 514360 Yes X No Yes X No Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of a list the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that securities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) CHPRK 2018-1A Sub 04/15/2030	EIN of par I transferor (but is not treated as such und EIN of 04-3 If partnership assets? It is regularly traded on an established on (see instructions)	yes No der section 367), partnership 514360 Yes X No Yes X No Yes X No Yes X No Ga Identifying number, if any
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of a list the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that securities market? Part II Transferee Foreign Corporation Information CHPRK 2018-1A Sub 04/15/2030 6 Address (including country)	EIN of par I transferor (but is not treated as such und EIN of 04-3 If partnership assets? It is regularly traded on an established on (see instructions) 5	yes No der section 367), partnership 514360 Yes X No Yes X No Yes X No is Identifying number, if any ib Reference ID number
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of a list the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that securities market? Part II Transferee Foreign Corporation Information CHPRK 2018-1A Sub 04/15/2030 6 Address (including country) 190 Elgin Avenue	EIN of par I transferor (but is not treated as such und EIN of 04-3 If partnership assets? It is regularly traded on an established on (see instructions) 5 1 1 1 1 1 1 1 5 1 1 1 1	yes No der section 367), partnership 514360 Yes X No Yes X No Yes X No is Identifying number, if any ib Reference ID number
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of a list the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that securities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) CHPRK 2018-1A Sub 04/15/2030 6 Address (including country) 190 Elgin Avenue George Town CJ KY1-9005 Cayman Is 7 Country code of country of incorporation or organization (see instructions)	EIN of par I transferor (but is not treated as such und EIN of 04-3 If partnership assets? It is regularly traded on an established on (see instructions) 5 1 1 1 1 1 1 1 5 1 1 1 1	yes No der section 367), partnership 514360 Yes X No Yes X No Yes X No is Identifying number, if any ib Reference ID number
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of a list the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that securities market? Part II Transferee Foreign Corporation Information 4 Name of transferee (foreign corporation) CHPRK 2018-1A Sub 04/15/2030 6 Address (including country) 190 Elgin Avenue George Town CJ KY1-9005 Cayman Is CJ Country code of country of incorporation or organization (see instance)	EIN of par EIN of par EIN of 04-3 If partnership assets? It is regularly traded on an established on (see instructions) 5 1ands tructions)	yes No der section 367), partnership 514360 Yes X No Yes X No Yes X No Yes X No Ga Identifying number, if any Sb Reference ID number see instructions)

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Page	_

	ation Regard	ling Transfer of Property (see	instructi	ons)		
Section A—Cash Type of property	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
Cash	transfer C	property		date of transfer	basis	transfer
	emainder of Part	III and go to Part IV.				X Yes No
	operty (other t	than intangible property subject (b)	to section	on 367(d)) (c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	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 b Was the transferor (including a branch If "Yes," continue t c Immediately after transferee foreign If "Yes," continue t d Enter the transferr	n? 12b. r a domestic corp h that is a foreign to line 12c. If "No the transfer, was corporation? to line 12d. If "No ed loss amount in transfer property	," skip line 12d, and go to line 13. ncluded in gross income as required u described in section 367(d)(4)?	all of the as 6-owned for e 13. eholder wit	esets of a foreign brain preign corporation? The respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Su	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Droporty described						
Property described in sec. 367(d)(4)						
550. 501 (4)(4)						
Totala						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Form **926**(Rev. November 2018)
Department of the Treasury

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. 1

	nal Revenue Service Attach to your income tax return	or the year of the transfer or dist	ribution.	Seque	ence N	lo. I	4 0
	art I U.S. Transferor Information (see instructions)		1				
	e of transferor		Identifying number	er (see	instru	ctions	s)
	enry County Community Foundation,		21 11504				
	nc.		31-117043				
1	Is the transferee a specified 10%-owned foreign corporation that is no			Y	es		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 of	controlled (under section 368(c)) by					
				\vdash	es	=	No
b				Y	es		No
	If not, list the controlling shareholder(s) and their identifying number(s)) .					
	Controlling charabolder	Identife	ing number				
	Controlling shareholder	identily	ing number				
С	If the transferor was a member of an affiliated group filing a consolidat						
	corporation?			Y	es		No
	If not, list the name and employer identification number (EIN) of the pa	rent corporation.					
	Name of parent corporation	EIN of par	ent corporation				
		•	-				
Ь	Have basis adjustments under section 367(a)(4) been made?				es		No
ŭ	Thave basic adjustments and section out (a)(4) been made.			ш.	00		
3	If the transferor was a partner in a partnership that was the actual tran	sferor (but is not treated as such un	der section 367),				
_	complete questions 3a through 3d.						
a	List the name and EIN of the transferor's partnership.						
	Name of partnership	EIN of	partnership				
:	Adamas Opportunities, L.P.	04-3	514360				
	Did the partner pick up its pro rata share of gain on the transfer of part				es	X	Nο
	Is the partner disposing of its entire interest in the partnership?	p ======.		\blacksquare	es	_	No
	Is the partner disposing of an interest in a limited partnership that is re	gularly traded on an established		ш.			
-	securities market?	- -		□ Y	es	X	Nο
Pa	art II Transferee Foreign Corporation Information (
	Name of transferee (foreign corporation)	-	5a Identifying num	ber. if	anv		
-	Coupang Corp, fka Forward		98-12673		٠		
6	Address (including country)		5b Reference ID nu				
-	570, Songpa-Daero, Tower		see instructions)	• •			
	Seoul KS KY1-1102 Korea (South)	,	,				
7	Country code of country of incorporation or organization (see instruction						
-	KS	,					
8	Foreign law characterization (see instructions)						
•	Corporation						
	Is the transferee foreign corporation a controlled foreign corporation?			V	es	X	Nο

Page	2

Part III Inform	ation Regar	ding Transfer of Property (see	instruction	ons)		
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	06/25/1	9		38		
	emainder of Par	t III and go to Part IV.				X Yes No
•	operty (otner	than intangible property subject (b)	to section	(c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	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 b Was the transferor (including a branch If "Yes," continue to c Immediately after transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	of a foreign branch? 12b. r a domestic corch that is a foreign to line 12c. If "Note the transfer, was corporation? to line 12d. If "Note the loss amount transfer property	poration that transferred substantially all n disregarded entity) to a specified 10% o," skip lines 12c and 12d, and go to line is the domestic corporation a U.S. sharel o," skip line 12d, and go to line 13. included in gross income as required urly described in section 367(d)(4)?	lisregarde	ed entity) transferred sets of a foreign bra preign corporation? h respect to the	to a	Yes No Yes No Yes No Yes No Yes No Yes No
Section C—Intangib	le Property S	ubject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
			+-			+
Totals						+

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. Depa

Return by a U.S. Transferor of Property to a Foreign Corporation

OMB No. 1545-0026

Department of the Treasury Internal Revenue Service	f the Treasury Go to www.irs.gov/Form926 for instructions and the latest information.		Attachment Sequence No. 128
Part I U.S. Tran	nsferor Information (see instructions)		
Name of transferor		Identifying num	nber (see instructions)
Henry County	Community Foundation,	31-11704	412

Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	21 1170412
Inc.1 Is the transferee a specified 10%-owned foreign corporation that is no	31-1170412 of a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d	· · · · · · · · · · · · · · · · · · ·
a If the transfer was a section 361(a) or (b) transfer, was the transferor	
five or fower demostic corporations?	□ Vaa □ Na
	Yes No
If not, list the controlling shareholder(s) and their identifying number(s	
Controlling shareholder	Identifying number
	, ,
c If the transferor was a member of an affiliated group filing a consolida	tod rature, was it the parent
corporation?	
·	
If not, list the name and employer identification number (EIN) of the p	яен согрогацон.
Name of parent corporation	EIN of parent corporation
Hame of parent corporation	Env or paronic 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 tran	
complete questions 3a through 3d.	isicioi (sati is not treated as such under section our),
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
p	
Adamas Opportunities, L.P.	04-3514360
b Did the partner pick up its pro rata share of gain on the transfer of par	
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 re	egularly traded on an established
securities market?	
Part II Transferee Foreign Corporation Information	,
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Coupang Corp, fka Forward	98-1267341
6 Address (including country)	5b Reference ID number
570 Songpa-Daero, Tower	(see instructions)
 Seoul KS KY1-1102 Korea (South Country code of country of incorporation or organization (see instruction) 	·
KS	ono,
8 Foreign law characterization (see instructions)	
Corporation	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No

Page ∠

Part III Inform	ation Regar	ding Transfer of Property (see	instruction	ons)			
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 o transfer	n
Cash	06/26/1	9		31			
	emainder of Par	t III and go to Part IV.				_ X Yes	No
	operty (otner	than intangible property subject	to section	on 367(a)) (c)	(d)	(e)	
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recognized o	n
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with							
built-in loss							
Totals							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	If a foreign brant? 12b. a domestic corn that is a foreigo line 12c. If "Nohe transfer, was corporation? o line 12d. If "Nohe loss amount transfer property	o," skip line 12d, and go to line 13. included in gross income as required ur	disregarde	ed entity) transferred sets of a foreign bra preign corporation? h respect to the	to a	Yes !	No No No
Section C—Intangibl	le Property S	ubject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfe (see instructions	r
Property described in sec. 367(d)(4)							
Totals							

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. Depa

Return by a U.S. Transferor of Property to a Foreign Corporation

OMB No. 1545-0026

Department of the Treasury Internal Revenue Service	f the Treasury Go to www.irs.gov/Form926 for instructions and the latest information.		Attachment Sequence No. 128
Part I U.S. Tran	nsferor Information (see instructions)		
Name of transferor		Identifying num	nber (see instructions)
Henry County	Community Foundation,	31-11704	412

Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	21 1170412
Inc.1 Is the transferee a specified 10%-owned foreign corporation that is no	31-1170412 of a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d	· · · · · · · · · · · · · · · · · · ·
a If the transfer was a section 361(a) or (b) transfer, was the transferor	
five or fower demostic corporations?	□ Vaa □ Na
	Yes No
If not, list the controlling shareholder(s) and their identifying number(s	
Controlling shareholder	Identifying number
	, ,
c If the transferor was a member of an affiliated group filing a consolida	tod rature, was it the parent
corporation?	
·	
If not, list the name and employer identification number (EIN) of the p	яен согрогацон.
Name of parent corporation	EIN of parent corporation
Hame of parent corporation	Env or paront 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 tran	
complete questions 3a through 3d.	isicioi (sut is not treated as such under section our),
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
p	
Adamas Opportunities, L.P.	04-3514360
b Did the partner pick up its pro rata share of gain on the transfer of par	
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 re	egularly traded on an established
securities market?	Yes X No
Part II Transferee Foreign Corporation Information	,
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Coupang Corp, fka Forward	98-1267341
6 Address (including country)	5b Reference ID number
570 Songpa-Daero, Tower	(see instructions)
 Seoul KS KY1-1102 Korea (South Country code of country of incorporation or organization (see instruction) 	·
KS	ono,
8 Foreign law characterization (see instructions)	
Corporation	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No

Page	2

	ation Regar	ding Transfer of Property (see i	nstructi	ons)			
Section A—Cash	(a)	(6)		(a)	(4)		
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 transfer	on
Cash	06/27/1			46			
	emainder of Par	erred? t III and go to Part IV. than intangible property subject t		on 367(d))		X Yes	No
Type of	(a)	(b)		(c)	(d)	(e)	
property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recognized transfer	on
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with							
built-in loss							
Totals							
recognition agreem 12a Were any assets of foreign corporation of "Yes," go to line of the waste transferor (including a branch of "Yes," continue to the waste foreign of the wa	nent was filed? If a foreign bran If a foreign bran If a domestic cor In that is a foreig In that is a foreign In that is a f	o," skip line 12d, and go to line 13. included in gross income as required und y described in section 367(d)(4)? ons 14a through 15.	of the as owned fo 13. older wit	ed entity) transferred esets of a foreign bra preign corporation? h respect to the	nch	Yes	No No No
Section C—Intangibl		ubject to Section 367(d)	1	T T		T (5	
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of trans (see instruction	fer
Property described in sec. 367(d)(4)							
Totals							

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. November 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

Attachment Sequence No. 128

Part I U.S. Transferor Information (see instructions)	·
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is no	t a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor	
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	Yes No
in not, list the controlling shareholder(s) and their identifying humber(s)	
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidat	
corporation?	
If not, list the name and employer identification number (EIN) of the pa	arent 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 tran	sferor (but is not treated as such under section 367),
complete questions 3a through 3d.	·
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
·	
Adamas Opportunities, L.P.	04-3514360
b Did the partner pick up its pro rata share of gain on the transfer of partner	mership egets?
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 re	
securities market?	
Part II Transferee Foreign Corporation Information	
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Coupang Corp, fka. Forward	38-1267341
6 Address (including country)	5b Reference ID number
570, Songpa-Daero, Tower	(see instructions)
Seoul KS KY1-1102 Korea (South)	· · · · · · · · · · · · · · · · · · ·
7 Country code of country of incorporation or organization (see instruction	ons)
KS	
8 Foreign law characterization (see instructions)	
 8 Foreign law characterization (see instructions) Corporation 9 Is the transferee foreign corporation a controlled foreign corporation? 	Yes X No

Page	2

	ation Regar	ding Transfer of Property (see	instruction	ons)			
Section A—Cash				, ,			,
Type of property	(a) Date of transfer	(b) Description of property	1	(c) Fair market value on date of transfer	(d) Cost or other basis	Gain recog	nized on
Cash	09/19/1			33	Bacic	T drain	7101
	emainder of Par	t III and go to Part IV.				X Yes	☐ No
		than intangible property subject	to section		(4)	1 /0	,
Type of property	(a) Date of transfer	(b) Description of property	- 1	(c) Fair market value on date of transfer	(d) Cost or other basis	Gain recog trans	nized on
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with built-in loss							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	n? 12b. r a domestic con n that is a foreig to line 12c. If "N the transfer, wa corporation? to line 12d. If "N ed loss amount transfer propert	poration that transferred substantially all n disregarded entity) to a specified 10% o," skip lines 12c and 12d, and go to lines the domestic corporation a U.S. share o," skip line 12d, and go to line 13. included in gross income as required ury described in section 367(d)(4)?	l of the as -owned fo e 13. holder wit	sets of a foreign bra preign corporation? h respect to the	nch	Yes Yes Yes	No No No No
Section C—Intangib	le Property S	ubject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income in for year of (see inst	nclusion
Property described in sec. 367(d)(4)							
Totals							

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. Depa

Return by a U.S. Transferor of Property to a Foreign Corporation

OMB No. 1545-0026

Department of the Treasury Internal Revenue Service 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			Attachment Sequence No. 128
Part I U.S. Tran	nsferor Information (see instructions)		
Name of transferor		Identifying num	nber (see instructions)
Henry County	Community Foundation,	31-11704	412

Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	21 1170412
Inc.1 Is the transferee a specified 10%-owned foreign corporation that is no	31-1170412 of a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d	· · · · · · · · · · · · · · · · · · ·
a If the transfer was a section 361(a) or (b) transfer, was the transferor	
five or fower demostic corporations?	□ Vaa □ Na
	Yes No
If not, list the controlling shareholder(s) and their identifying number(s	
Controlling shareholder	Identifying number
	, ,
c If the transferor was a member of an affiliated group filing a consolida	tod rature, was it the parent
corporation?	
·	
If not, list the name and employer identification number (EIN) of the p	яен согрогацон.
Name of parent corporation	EIN of parent corporation
Hame of parent corporation	Env or paronic 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 tran	
complete questions 3a through 3d.	isicioi (sati is not treated as such under section our),
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
p	
Adamas Opportunities, L.P.	04-3514360
b Did the partner pick up its pro rata share of gain on the transfer of par	
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 re	egularly traded on an established
securities market?	Yes X No
Part II Transferee Foreign Corporation Information	,
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Coupang Corp, fka Forward	98-1267341
6 Address (including country)	5b Reference ID number
570 Songpa-Daero, Tower	(see instructions)
 Seoul KS KY1-1102 Korea (South Country code of country of incorporation or organization (see instruction) 	·
KS	ono,
8 Foreign law characterization (see instructions)	
Corporation	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No

Page	2
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	ation Rega	rding Transfer of Property (see i	instructio	ons)			
Section A—Cash							
Type of property	(a) Date of transfer	(b) Description of property	ı	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recogni transfe	
Cash	12/18/1	.9		25			
	emainder of Pa	ırt III and go to Part IV.				X Yes [No
	operty (otne	r than intangible property subject t	o sectio	on 367(a)) (c)	(d)	(e)	
Type of property	Date of transfer	Description of property	I	Fair market value on date of transfer	Cost or other basis	Gain recogni: transfe	
Stock and							
securities		_					
Inventory							
Other property (not listed under another category)							
Property with							
built-in loss							
Totals							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to c Immediately after t transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	of a foreign braining 12b. 12b. 12b. 1 domestic connumber is a foreign 1 line 12c. If "Note transfer, was 1 corporation? 1 line 12d. If "Note loss amount 1 cransfer proper	proporation that transferred substantially all gn disregarded entity) to a specified 10%-No," skip lines 12c and 12d, and go to line as the domestic corporation a U.S. shareh No," skip line 12d, and go to line 13. t included in gross income as required unity described in section 367(d)(4)?	of the as owned fo 13. nolder with	sets of a foreign brangering corporation?	to a	Yes Yes Yes Yes Yes	No No No No No
Section C—Intangibl	le Property S	Subject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclifor year of tracking (see instru-	ansfer
Property described in sec. 367(d)(4)							
						+	
Totals							

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. November 2018) Department of the Treasury

Return by a U.S. Transferor of Property to a Foreign Corporation

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

OMB No. 1545-0026

Attachment Sequence No. 128

Part I U.S. Transferor Information (see instructions)	Sequence No. 120
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	,
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is not	a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor of	
1 5:10 1 6 1:11 6 0 1 6 0	Yes No
b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identifying number(s)	Yes No
in not, list the controlling shareholder(s) and their identifying humber(s)	
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidat	ed return, was it the parent
corporation?	
If not, list the name and employer identification number (EIN) of the pa	rent corporation
i not, not the hame and employer identification hamber (Enty of the pe	
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 tran complete questions 3a through 3d.	sferor (but is not treated as such under section 367),
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
Adamas Opportunities, L.P.	04-3514360
b Did the partner pick up its pro rata share of gain on the transfer of part	
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 re	Yes X No
securities market?	
Part II Transferee Foreign Corporation Information (
4 Name of transferee (foreign corporation)	5a Identifying number, if any
CRMN 2015-1A	, , , , , , , , , , , , , , , , , , ,
6 Address (including country)	5b Reference ID number
PO Box 1093	(see instructions)
Grand Cayman CJ KY1-1102 Cayman Island	<u> </u>
7 Country code of country of incorporation or organization (see instruction	ns)
CJ	
8 Foreign law characterization (see instructions) Corporation	
	Yes X No
9 Is the transferee foreign corporation a controlled foreign corporation?	

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Page	_

Part III Inform Section A—Cash	nation Regard	ing Transfer of Property (see	e instructi	ons)		
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	01/29/19			4		
10 Was cash the only If "Yes," skip the r		red? III and go to Part IV.				X Yes No
Section B—Other P	roperty (other t	han intangible property subject	t to section	on 367(d))		
Type of property	(a) Date of transfer	(b) Description of property		(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and						
securities Inventory						
o						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
(including a brance of "Yes," continue continue continue transferee foreign of "Yes," continue do Enter the transferor	a 12b. or a domestic corporation to line 12c. If "No," the transfer, was to corporation? to line 12d. If "No, red loss amount in	" skip line 12d, and go to line 13. ncluded in gross income as required u described in section 367(d)(4)?	all of the as %-owned for ne 13. eholder wit	ssets of a foreign brai preign corporation? h respect to the		Yes
Section C—Intangib	ole Property Sul	bject to Section 367(d)				
- Intangle	(a)	(b)	(c)	(d)	(e)	(f)
Type of property	Date of transfer	Description of property	Useful life	Arm's length price on date of transfer	Cost or other basis	Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. November 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

Attachment Sequence No. 128

Pa	rt I U.S. Transferor Information (see instructions)				
Не	me of transferor Henry County Community Foundation,		Identifying number (uctions)
LI	nc.		31-1170412		
1	Is the transferee a specified 10%-owned foreign corporation that is no	•	L	Yes	No
	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		1	
				Yes	□ No
b				Yes	No
	If not, list the controlling shareholder(s) and their identifying number(s).			
	Controlling shareholder	Identify	ing number		
С	If the transferor was a member of an affiliated group filing a consolidate corporation?			Yes	No
	If not, list the name and employer identification number (EIN) of the pa	arent corporation.	_	•	
	(=,				
	Name of parent corporation	EIN of pare	ent corporation		
d	Have basis adjustments under section 367(a)(4) been made?			Yes	No
	If the transferor was a partner in a partnership that was the actual trancomplete questions 3a through 3d. List the name and EIN of the transferor's partnership.	sferor (but is not treated as such und	der section 367),		
	· · ·				
	Name of partnership	EIN of p	partnership		
Z	Adamas Opportunities, L.P.	04-3	514360		
b	Did the partner pick up its pro rata share of gain on the transfer of par	tnership 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 re	gularly traded on an established			
	securities market?			Yes	X No
Pa	rt II Transferee Foreign Corporation Information	see instructions)			
4	Name of transferee (foreign corporation)	5	a Identifying numbe	r , if any	
	Dryden 41 Senior Loan Fund				
6	Address (including country)	5	b Reference ID numb	er	
	PO Box 1093	(5	see instructions)		
	Grand Cayman CJ KY1-1102 Cayman Island	ls			
7	Country code of country of incorporation or organization (see instruction	•			
	CJ				
8	Foreign law characterization (see instructions)				
	Corporation				
9	Is the transferee foreign corporation a controlled foreign corporation?			Yes	X No

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Page	_

Part III Inform Section A—Cash	ation Regard	ding Transfer of Property (see	instructi	ons)		
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	05/17/18			5		
10 Was cash the only If "Yes," skip the re		erred? III and go to Part IV.				X Yes No
Section B—Other Pr		than intangible property subject	to section	on 367(d))		
Type of property	(a) Date of transfer	(b) Description of property		(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and						
securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to c Immediately after transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	n? 12b. r a domestic corp h that is a foreigr to line 12c. If "No the transfer, was corporation? to line 12d. If "No ed loss amount i transfer property	ch (including a branch that is a foreign of coration that transferred substantially all a disregarded entity) to a specified 10% or, skip lines 12c and 12d, and go to line the domestic corporation a U.S. share or, skip line 12d, and go to line 13. Included in gross income as required und described in section 367(d)(4)?	I of the as -owned for e 13. holder wit	ssets of a foreign brai preign corporation? h respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Sເ	ubject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
						,
Property described						
in sec. 367(d)(4)						
Totals						
			and the second second			<u> </u>

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. November 2018) Department of the Treasury

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 Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any Flat 2018-1A Sub 04/17/2031 Address (including country) 5b Reference ID number PO Box 1093 (see instructions) Grand Cayman CJ KY1-1102 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation

Is the transferee foreign corporation a controlled foreign corporation?

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Page	_

Part III Inform Section A—Cash	ation Regard	ling Transfer of Property (see	instructi	ons)		
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	02/22/18			122	Dasis	uansici
10 Was cash the only If "Yes," skip the re		rred? III and go to Part IV.				X Yes No
Section B—Other Pr		than intangible property subject	to section			-
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 If "Yes," continue to c Immediately after transferee foreign If "Yes," continue to d Enter the transferr	12b. r a domestic corp h that is a foreign to line 12c. If "No the transfer, was corporation? to line 12d. If "No red loss amount in transfer property	," skip line 12d, and go to line 13. ncluded in gross income as required un described in section 367(d)(4)?	Il of the as o-owned for e 13. holder wit	ssets of a foreign brai preign corporation? h respect to the		Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Su	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
						, ,
Property described						
in sec. 367(d)(4)						
Totals						
				<u> </u>		

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. November 2018)

Return by a U.S. Transferor of Property to a Foreign Corporation

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

OMB No. 1545-0026

Attachment Department of the Treasury ▶ Attach to your income tax return for the year of the transfer or distribution. Sequence No. 128 Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any HLA 2018-1A Sub 7/20/2031 5b Reference ID number Address (including country) PO Box 1093 (see instructions) Grand Cayman CJ KY1-1102 Country code of country of incorporation or organization (see instructions)

Is the transferee foreign corporation a controlled foreign corporation?

Foreign law characterization (see instructions)

Corporation

Page 2	2

Part III Informa	ation Rega	rding Transfer of Property (see i	nstructi	ons)		
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	05/11/1	8		3		
•	mainder of Pa	rt III and go to Part IV.				X Yes No
		r than intangible property subject t	o section		(d)	(o)
Type of property	(a) Date of transfer	(b) Description of property		(c) Fair market value on date of transfer	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 1 b Was the transferor (including a branch If "Yes," continue to c Immediately after th transferee foreign of If "Yes," continue to d Enter the transferre 13 Did the transferor to	f a foreign brar? 12b. a domestic co that is a foreigo line 12c. If "N the transfer, was corporation? o line 12d. If "N the doss amount	rporation that transferred substantially all gn disregarded entity) to a specified 10%-lo," skip lines 12c and 12d, and go to line as the domestic corporation a U.S. shareh	of the as owned for 13. older with	ed entity) transferred seets of a foreign bra preign corporation? th respect to the	to a nch	Yes No Yes No Yes No Yes No Yes No Yes No
Section C—Intangible	e Property S	Subject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Form **926**(Rev. November 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

Attachment Sequence No. 128

Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any MDPK 2013-11A Sub 07/23/2047 Address (including country) 5b Reference ID number Clifton House 75 Fort St (see instructions) CJ KY1-1108 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation Is the transferee foreign corporation a controlled foreign corporation? Yes

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Part III Inform	nation Regard	ling Transfer of Property (see	instruction	ons)		
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	05/15/18			29	Dasis	uansiei
10 Was cash the only If "Yes," skip the r	· · · ·	rred? III and go to Part IV.				X Yes No
Section B—Other Pr		than intangible property subject	to section			
Type of property	(a) Date of transfer	(b) Description of property	1	(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 brance of "Yes," continue of the	12b. r a domestic corp h that is a foreign to line 12c. If "No the transfer, was corporation? to line 12d. If "No red loss amount in transfer property	," skip line 12d, and go to line 13. ncluded in gross income as required undescribed in section 367(d)(4)?	Il of the as o-owned for e 13. holder wit	sets of a foreign brain oreign corporation? The respect to the	······································	Yes No Yes No Yes No
Section C—Intensib	lo Proporty Su	bject to Section 367(d)				
Section C—intangib	(a)	(b)	(c)	(d)	(e)	(f)
Type of property	Date of transfer	Description of property	Useful life	Arm's length price on date of transfer	Cost or other basis	Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. November 2018) Department of the Treasury

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

Sequence No. 128

Attachment

Inter	nal Revenue Service	Attach to your income tax return to	for the year of the transfer or dis	stribution.	Se	quence l	No.	<u> 128</u>
Pa	art I U.S. Tran	nsferor Information (see instructions)						
	e of transferor	Community Foundation,		Identifying num	oer (s	ee instru	uction	ns)
	nc.			31-11704	12			
1 2 a	Is the transferee a sport of the transferor was a sport of the transfer was a sport of the transferor remarks.	· · · · · · · · · · · · · · · · · · ·	controlled (under section 368(c)) b	у		Yes Yes Yes		No No No
	C	ontrolling shareholder	Identi	fying number				
c	corporation?	a member of an affiliated group filing a consolidat	·			Yes		No
	Nai	me of parent corporation	EIN of pa	arent corporation				
		-td ti 207/- \/				V		NI-
3	If the transferor was a complete questions 3	nts under section 367(a)(4) been made? a partner in a partnership that was the actual tran a through 3d. N of the transferor's partnership.	sferor (but is not treated as such ເ			Yes		No
		Name of partnership	EIN o	f partnership				
	Adamas Oppo	rtunities, L.P.	04-	3514360				
b c	Did the partner pick u Is the partner disposin Is the partner disposin	p its pro rata share of gain on the transfer of parting of its entire interest in the partnership?	nership assets?			Yes Yes	XX	No No
Pá		ee Foreign Corporation Information (see instructions)			100		-110
4	Name of transferee (f	oreign corporation)		5a Identifying nur	nber	, if any		
7	Address (including co Clifton House, 7 George Town	ountry)		5b Reference ID n (see instructions)	umbe	∍ r		
8		rization (see instructions) n						
9	Is the transferee forei	gn corporation a controlled foreign corporation?				Yes	X	No

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Page	_

	ation Regar	ding Transfer of Property (see	instructi	ons)			
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	Gain recog	gnized on
Cash	05/14/1			13	Bucic	uane	<i>7</i> 101
	emainder of Par	t III and go to Part IV.		207/41)		X Yes	☐ No
	operty (otner (a)	than intangible property subject	to section	on 367(a)) (c)	(d)	(e	
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recog	gnized on
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with built-in loss							
Duiit-iii ioss							
Totals							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to c Immediately after transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	n? 12b. r a domestic cor n that is a foreig to line 12c. If "N the transfer, wa corporation? to line 12d. If "N ed loss amount transfer propert	poration that transferred substantially a n disregarded entity) to a specified 10% o," skip lines 12c and 12d, and go to lines the domestic corporation a U.S. share o," skip line 12d, and go to line 13. included in gross income as required uy described in section 367(d)(4)?	ill of the as 6-owned fo e 13. eholder wit	esets of a foreign bra preign corporation? th respect to the	nch	Yes Yes Yes	No No No No
Section C—Intangib	le Property S	ubject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income in for year of (see inst	nclusion
.							
Property described						1	
in sec. 367(d)(4)						1	
Totals							

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Form **926**(Rev. November 2018)
Department of the Treasury

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

	nal Revenue Service Attach to your income tax return	or the year of the transfer or distri	bution.	Sequenc	e No. Î	128
	art I U.S. Transferor Information (see instructions)		Г			
	e of transferor		Identifying numb	er (see ins	struction	ıs)
	enry County Community Foundation,		24 44 5 6 4			
	nc.		31-11704			
1	Is the transferee a specified 10%-owned foreign corporation that is no			Yes		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 of	controlled (under section 368(c)) by				
				Yes		No
b				Yes		No
	If not, list the controlling shareholder(s) and their identifying number(s)) .				
	Controlling shousholds	lala nétér i				
	Controlling shareholder	identify	ng number			
С	If the transferor was a member of an affiliated group filing a consolidat	ed return, was it the parent				
	corporation?	· · · · · · · · · · · · · · · · · · ·		Yes		No
	If not, list the name and employer identification number (EIN) of the pa					
	in not, list the name and employer identification number (Livy of the pa	ilent corporation.				
	No. of and an artist	EIN . C				
	Name of parent corporation	EIN of pare	ent 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 tran	sferor (but is not treated as such und	ler section 367)			
3	complete questions 3a through 3d.	sieror (but is not treated as such und	iei section sor),			
а	List the name and EIN of the transferor's partnership.					
	Name of partnership	EIN of p	artnership			
7	Adamas Opportunities, L.P.	04-35	514360			
b	Did the partner pick up its pro rata share of gain on the transfer of part	nership 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 re	gularly traded on an established			· <u></u>	
	securities market?			Yes	X	No
	securities market:					
Pa	art II Transferee Foreign Corporation Information (•		
	Transferee Foreign Corporation Information (Name of transferee (foreign corporation)	see instructions)	a Identifying num	ber, if an	ny	
	art II Transferee Foreign Corporation Information (see instructions)	a Identifying num	ıber, if ar	ıy	
4	Transferee Foreign Corporation Information (Name of transferee (foreign corporation)	see instructions) 5a	a Identifying num		ny	
4	Name of transferee Foreign Corporation Information (MDPK-2016-20A Sub 4/27/027	see instructions) 56			ny	
4	Art II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) MDPK-2016-20A Sub 4/27/027 Address (including country)	see instructions) 56 58 (s	Reference ID nu		ny	
6	Name of transferee Foreign Corporation Information (Name of transferee (foreign corporation) MDPK-2016-20A Sub 4/27/027 Address (including country) Clifton House, 75 Fort St	see instructions) 56 (s	Reference ID nu		ny	
6	Name of transferee Foreign Corporation Information (Name of transferee (foreign corporation) MDPK-2016-20A Sub 4/27/027 Address (including country) Clifton House, 75 Fort St George Town CJ KY1-1108 Cayman Island	see instructions) 56 (s	Reference ID nu		ny	
6	Name of transferee Foreign Corporation Information (Name of transferee (foreign corporation) MDPK-2016-20A Sub 4/27/027 Address (including country) Clifton House, 75 Fort St George Town CJ KY1-1108 Cayman Island Country code of country of incorporation or organization (see instruction)	see instructions) 56 (s	Reference ID nu		ny	
6	Art II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) MDPK-2016-20A Sub 4/27/027 Address (including country) Clifton House, 75 Fort St George Town CJ KY1-1108 Cayman Island Country code of country of incorporation or organization (see instruction CJ)	see instructions) 56 (s	Reference ID nu		ny	

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	ation Regar	<mark>ding Transfer of Property</mark> (see	e instructi	ons)			
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	Gain recog	gnized on
Cash	transion	o property		12	Bacio	T Grant	7101
	emainder of Par	rt III and go to Part IV.				X Yes	☐ No
		than intangible property subject	to section		(4)	1 /2	
Type of property	(a) Date of transfer	(b) Description of property		(c) Fair market value on date of transfer	(d) Cost or other basis	Gain recog trans	nized on
Stock and							
securities							
Inventory						<u> </u>	
Other property (not listed under another category)							
Property with built-in loss							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	n? 12b. r a domestic con n that is a foreig to line 12c. If "N the transfer, wa corporation? to line 12d. If "N ed loss amount transfer propert	rporation that transferred substantially a gn disregarded entity) to a specified 10% o," skip lines 12c and 12d, and go to lin s the domestic corporation a U.S. share lo," skip line 12d, and go to line 13. included in gross income as required u y described in section 367(d)(4)?	all of the as 6-owned for e 13. eholder wit	sets of a foreign bra preign corporation? h respect to the	nch	Yes Yes Yes	No No No No
Section C—Intangib	le Property S	ubject to Section 367(d)	ı				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income in for year of (see inst	nclusion
Property described in sec. 367(d)(4)							
Totals							
iolais				ı		1	

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. November 2018) Department of the Treasury

Return by a U.S. Transferor of Property to a Foreign Corporation

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Sequence No. 128

Attachment

Inter	nal Revenue Service	Attach to your income tax return to	for the year of the transfer or dis	stribution.	Se	quence	No. ′	<u> 128</u>
Pa	art I U.S. Tran	nsferor Information (see instructions)						
	e of transferor	Community Foundation,		Identifying num	oer (s	ee instr	uctior	ns)
	nc.			31-11704	12			
1 2 a	Is the transferee a sport of the transferor was a sport of the transfer was a sport of the transferor remarks.	· · · · · · · · · · · · · · · · · · ·	controlled (under section 368(c)) b	у		Yes Yes Yes		No No No
	C	ontrolling shareholder	Identi	fying number				
	corporation?	a member of an affiliated group filing a consolidat	·			Yes		No
	Na	me of parent corporation	EIN of pa	arent corporation				
	Have basis adjustmen	nts under section 367(a)(4) been made?			$\overline{}$	Yes	$\overline{}$	No
3	If the transferor was a complete questions 3	a partner in a partnership that was the actual tran	sferor (but is not treated as such ເ			res		No
		Name of partnership	EIN o	f partnership				
	Adamae Oppo	rtunities, L.P.	04-	3514360				
b	Did the partner pick u Is the partner disposin Is the partner disposin	p its pro rata share of gain on the transfer of parting of its entire interest in the partnership? ng of an interest in a limited partnership that is re	nership assets?			Yes Yes	X	No No
P:		ee Foreign Corporation Information (see instructions)			162		NO
4	Name of transferee (f		SSS mod dodono)	5a Identifying nui	nber	if anv		
7	MDPK-2016-2	• , ,		oa lachtilyilig hai	11001	, ii diriy		
7	Address (including co Clifton House 75 George Town Country code of coun	ountry)		5b Reference ID n (see instructions)	umbe	er 		
	CJ							
8	Corporation							
9	Is the transferee forei	gn corporation a controlled foreign corporation?				Yes	\mathbf{X}	No

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Part III Informa	ation Rega	rding Transfer of Property (see i	nstruction	ons)			
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 recogn transi	nized on
Cash	05/14/1	.8		50			
	emainder of Pa	rt III and go to Part IV.				X Yes	☐ No
•	operty (otne (a)	r than intangible property subject t	o section	on 367(d)) (c)	(d)	(e)	
Type of property	Date of transfer	Description of property	-	Fair market value on date of transfer	Cost or other basis	Gain recogn trans	nized on
Stock and							
securities						 	
Inventory						 	
Other property (not listed under another category)							
Property with							
built-in loss							
Totals							
foreign corporation If "Yes," go to line of the was the transferor (including a branch of "Yes," continue to transferee foreign of the was a continue to t	f a foreign braing? 12b. a domestic conthat is a foreign line 12c. If "Net transfer, was corporation? o line 12d. If "Net loss amountransfer proper	proporation that transferred substantially all grid disregarded entity) to a specified 10%-lo," skip lines 12c and 12d, and go to line as the domestic corporation a U.S. shareh loo," skip line 12d, and go to line 13. It included in gross income as required unity described in section 367(d)(4)?	of the as owned fo 13. nolder with	ed entity) transferred sets of a foreign bra breign corporation? h respect to the	nch	Yes Yes Yes Yes	NoNoNoNoNoNo
Section C—Intangibl	e Property S	Subject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income infor year of (see instr	iclusion transfer
Property described in sec. 367(d)(4)							
Totals							

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. November 2018) Department of the Treasury

Return by a U.S. Transferor of Property to a Foreign Corporation

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	of the year of the transfer of distribution.
Name of transferor Henry County Community Foundation,	Identifying number (see instructions)
Inc.	31-1170412
 1 Is the transferee a specified 10%-owned foreign corporation that is not 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 of five or fewer domestic corporations? 	ontrolled (under section 368(c)) by Yes No Yes No Yes No Yes No Yes No
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidate	and rature, was it the parent
corporation? If not, list the name and employer identification number (EIN) of the pa	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 transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	sferor (but is not treated as such under section 367),
Name of partnership	EIN of partnership
	The state of
Adamas Opportunities, L.P.	04-3514360
b Did the partner pick up its pro rata share of gain on the transfer of part	
	Yes X No
d Is the partner disposing of an interest in a limited partnership that is re-	
Part II Transferee Foreign Corporation Information (
4 Name of transferee (foreign corporation)	5a Identifying number, if any
MDPK-2016-22A	
6 Address (including country)	5b Reference ID number
Clifton House 75 Fort St	(see instructions)
George Town CJ KY1-1108 Cayman Island	<u> </u>
 Country code of country of incorporation or organization (see instruction CJ 	nis)
8 Foreign law characterization (see instructions) Corporation	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No

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	ation Regar	ding Transfer of Property (see i	nstructi	ons)		
Section A—Cash	(a)	(b)	1	(6)	(d)	(0)
Type of	Date of	Description of		(c) Fair market value on	Cost or other	(e) Gain recognized on
property	transfer	property		date of transfer	basis	transfer
Cash	05/15/1	9		54		
10 Was cash the only						X Yes No
ii res, skip tile re	emamuer or Par	t III and go to Part IV.				
Section B—Other Pr	operty (other	than intangible property subject t	o secti	on 367(d))		
Type of	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
property	transfer	property		date of transfer	basis	transfer
Stock and						
securities						
Inventory						
011						
Other property						
(not listed under						
another category)						
Property with						
built-in loss						
Totals						
(including a branch If "Yes," continue to c Immediately after to transferee foreign If "Yes," continue to d Enter the transferre 13 Did the transferor to	12b. a domestic corn that is a foreigo line 12c. If "Nother transfer, was corporation? o line 12d. If "Nother transfer amount transfer property	poration that transferred substantially all n disregarded entity) to a specified 10%-p," skip lines 12c and 12d, and go to line is the domestic corporation a U.S. shareh p," skip line 12d, and go to line 13. included in gross income as required unity described in section 367(d)(4)?	of the as owned for 13. older wit	ssets of a foreign bra preign corporation? h respect to the	······································	Yes No Yes No Yes No Yes No
Section C—Intangible	le Property S	ubject to Section 367(d)				
	(a)	(b)	(c)	(d)	(e)	(f)
Type of property	Date of transfer	Description of property	Useful life	Arm's length price on date of transfer	Cost or other basis	Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)			+			+
			+			
			1			
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Form **926**(Rev. November 2018)
Department of the Treasury

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

Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any MDPK 2017-23A Sub 07/27/2030 Address (including country) 5b Reference ID number Clifton House 75 Fort St (see instructions) CJ KY1-1108 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation Is the transferee foreign corporation a controlled foreign corporation? Yes

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Page	_

Part III Informa Section A—Cash	ition Regard	ling Transfer of Property (see i	nstructio	ons)		
Type of property	(a) Date of transfer	(b) Description of	ı	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	05/14/01	property		65	Dasis	transiei
10 Was cash the only p		rred? III and go to Part IV.				X Yes No
Section B—Other Pro		than intangible property subject t	o sectio			
Type of property	(a) Date of transfer	(b) Description of property	ı	(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 1 b Was the transferor a (including a branch If "Yes," continue to c Immediately after th transferee foreign c If "Yes," continue to d Enter the transferree	2b. a domestic corp that is a foreign line 12c. If "No te transfer, was orporation? line 12d. If "No d loss amount ir ansfer property	," skip line 12d, and go to line 13. ncluded in gross income as required und described in section 367(d)(4)?	of the as owned fo 13. older with	sets of a foreign brain preign corporation?	nch	Yes No Yes No Yes No Yes No
Section C—Intangible	Property Su	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
20. 00. (2)(1)						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. November 2018) Department of the Treasury

Return by a U.S. Transferor of Property to a Foreign Corporation

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	of the year of the transfer of distribution.
Name of transferor Henry County Community Foundation, Inc.	Identifying number (see instructions) 31-1170412
1 5:10 1 6 1:11 6 0 1 6 0	ontrolled (under section 368(c)) by Yes No Yes No
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidat corporation? If not, list the name and employer identification number (EIN) of the particular corporation.	Yes No
Name of parent corporation	EIN of parent corporation
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	Yes No Seferor (but is not treated as such under section 367),
Name of partnership	EIN of partnership
Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 re securities market?	Yes X No gularly traded on an established
Part II Transferee Foreign Corporation Information (
4 Name of transferee (foreign corporation) MDPK 2017-25A Sub 04/25/2029	5a Identifying number, if any
6 Address (including country) Clifton House 75 Fort St George Town CJ KY1-1108 Cayman Island 7 Country code of country of incorporation or organization (see instruction CJ	·
8 Foreign law characterization (see instructions) Corporation	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No

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Part III Inform	ation Rega	rding Transfer of Property (see i	instructio	ons)		
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	05/17/1	-8		9		
	emainder of Pa	ırt III and go to Part IV.				X Yes No
	operty (otne (a)	r than intangible property subject t	o section	on 367(a)) (c)	(d)	(e)
Type of property	Date of transfer	Description of property	1	Fair market value on date of transfer	Cost or other basis	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 b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	of a foreign brain? 12b. If a domestic conthat is a foreign line 12c. If "Nather transfer, was corporation? In the line 12d. If "Nather transfer proper transfer proper	proporation that transferred substantially all gn disregarded entity) to a specified 10%-No," skip lines 12c and 12d, and go to line as the domestic corporation a U.S. shareh No," skip line 12d, and go to line 13. It included in gross income as required unity described in section 367(d)(4)?	of the as- owned for 13. nolder with	ed entity) transferred sets of a foreign bra breign corporation? h respect to the	to a	Yes No Yes No Yes No Yes No Yes No Yes No
Section C—Intangibl	le Property S	Subject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						1

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Form **926**(Rev. November 2018)
Department of the Treasury

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

Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any MDPK-2018-27A Address (including country) 5b Reference ID number Clifton House 75 Fort St (see instructions) CJ Ky1-1108 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation

Is the transferee foreign corporation a controlled foreign corporation?

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Page	_

Part III Inform Section A—Cash	ation Regardir	ng Transfer of Property (se	e instruction	ons)		
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	05/17/18	property		14	Dasis	uansiei
10 Was cash the only If "Yes," skip the re	r property transferre emainder of Part III					X Yes No
Section B—Other Pr		an intangible property subjec	t to section			
Type of property	(a) Date of transfer	(b) Description of property	1	(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 b Was the transferor (including a branch If "Yes," continue to c Immediately after transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	n? 12b. r a domestic corpor h that is a foreign d to line 12c. If "No," s the transfer, was th corporation? to line 12d. If "No," s ed loss amount inc	skip line 12d, and go to line 13. luded in gross income as required of secribed in section 367(d)(4)?	all of the as %-owned fone 13. eholder wit	sets of a foreign brai preign corporation? h respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Subj	ect to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
(-/(-/						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

(Rev. November 2018) Department of the Treasury

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

Intern	al Revenue Service	Attach to your income tax return	for the year of the transfer or dis	stribution.	Se	quence	No. ′	<u> 128</u>	
Pa	rt I U.S. Tran	nsferor Information (see instructions)							
	of transferor	Community Foundation,		Identifying numl	oer (s	ee instr	uctior	ns)	
	ac.	Community Foundaction,		31-11704	70412				
1 2 a	Is the transferee a spulif the transferor was a slight the transfer was a slight or fewer domestic Did the transferor rem	i ii4f4 41 4f0	controlled (under section 368(c)) b	у		Yes Yes Yes		No No No	
	C	Controlling shareholder	Ident	ifying number					
c	corporation?	a member of an affiliated group filing a consolida and employer identification number (EIN) of the p	· · · · · · · · · · · · · · · · · · ·			Yes		No	
	Nai	me of parent corporation	EIN of p	arent corporation					
	Have basis adjustmer	nts under section 367(a)(4) been made?				Yes		No	
3	If the transferor was a complete questions 3.	a partner in a partnership that was the actual trai	nsferor (but is not treated as such เ			103		140	
		Name of partnership	EIN c	of partnership					
-			0.4	2514260					
		rtunities, L.P.	1 1: 10	3514360	$\overline{}$	Yes	X	Na	
С	Is the partner disposir	p its pro rata share of gain on the transfer of paring of its entire interest in the partnership? ng of an interest in a limited partnership that is re				Yes	X	No No	
	securities market?					Yes	X	No	
.		ee Foreign Corporation Information	(see instructions)						
4	Name of transferee (f			5a Identifying nur	nber	, if any			
		29A Sub 10/18/2030		EL D (ID					
6	Address (including co			5b Reference ID n	umbe	er			
	Clifton House 75		a.	(see instructions)					
7	George Town	CJ KY1-1108 Cayman Islan try of incorporation or organization (see instructi							
'	CJ	in y or incorporation or organization (see instruct	ions <i>j</i>						
-8		rization (see instructions)							
•	Corporation								
9		gn corporation a controlled foreign corporation?				Yes	X	No	

Page	2

Part III Information Information III	ation Regard	ding Transfer of Property (see	instruction	ons)			
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 recogn transfe	
Cash	09/28/18			14			
	emainder of Part	erred? Ill and go to Part IV. than intangible property subject		on 367(d))		X Yes	No 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 recogn transfe	
Stock and		property			240.0		
securities							
Inventory							
Other property (not listed under another category)							
Property with built-in loss							
Totals							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to c Immediately after t transferee foreign of If "Yes," continue to d Enter the transferre	of a foreign brance 1? 12b. 12b. 14 domestic corporation 15 domestic corporation 16 domestic corporation 17 domestic corporation 18 domestic corporation 19 domestic corporation 10 domestic corporation 10 domestic corporation 10 domestic corporation 11 domestic corporation 12 domestic corporation 12 domestic corporation 13 domestic corporation 14 domestic corporation 15 domestic corporation 16 domestic corporation 17 domestic corporation 18 domestic corporation 19 domestic corporation 19 domestic corporation 19 domestic corporation 10 domestic corporati	o," skip line 12d, and go to line 13. included in gross income as required ur described in section 367(d)(4)?	disregarde	ed entity) transferred sets of a foreign bra preign corporation? h respect to the	to anch	Yes Yes Yes Yes Yes	No No No No No
Section C—Intangibl	e Property Su	ubject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inc for year of to (see instru	ansfer
Property described in sec. 367(d)(4)							
				l .		1	

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Form **926**(Rev. November 2018)
Department of the Treasury

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

	or the year of the transfer or distribution. Sequence No. 128
Part I U.S. Transferor Information (see instructions)	T
Name of transferor Henry County Community Foundation,	Identifying number (see instructions)
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is no	
2 If the transferor was a corporation, complete questions 2a through 2d.	Too I No
a If the transfer was a section 361(a) or (b) transfer, was the transfer or	controlled (under section 368(c)) by
	Yes No
1 5:10 / 6	Yes No
If not, list the controlling shareholder(s) and their identifying number(s)	
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidat corporation?	
If not, list the name and employer identification number (EIN) of the pa	
, , , , , , , , , , , , , , , , , , , ,	<u>'</u>
Name of parent corporation	EIN of parent corporation
111 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
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 tran	sferor (but is not treated as such under section 367),
complete questions 3a through 3d. a List the name and EIN of the transferor's partnership.	
	FIN of worknessels.
Name of partnership	EIN of partnership
Adamas Opportunities, L.P.	04-3514360
b Did the partner pick up its pro rata share of gain on the transfer of part	
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 re	
securities market?	
Part II Transferee Foreign Corporation Information (
4 Name of transferee (foreign corporation) MDPK 2018-32A Sub 01/22/2031	5a Identifying number, if any
6 Address (including country)	5b Reference ID number
,,	(see instructions)
7 Country code of country of incorporation or organization (see instruction	one)
. Country code of country of incorporation of organization (see instruction	лы,
8 Foreign law characterization (see instructions)	
Corporation9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No

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Page	_

Part III Inform Section A—Cash	ation Regard	ling Transfer of Property (see	instructi	ons)		
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	12/21/18			9		
10 Was cash the only If "Yes," skip the re		rred? III and go to Part IV.				X Yes No
Section B—Other Pr	operty (other t	than intangible property subject	to section	on 367(d))		
Type of property	(a) Date of transfer	(b) Description of property		(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and						
securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to c Immediately after to transferee foreign If "Yes," continue to d Enter the transferor	n? 12b. 1a domestic corp 1 that is a foreign 1 line 12c. If "No 1 the transfer, was 1 corporation? 1 line 12d. If "No 1 line 12d. If "No 1 line 1 line transfer property	," skip line 12d, and go to line 13. ncluded in gross income as required un described in section 367(d)(4)?	I of the as o-owned for e 13. holder wit	ssets of a foreign brai preign corporation? h respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangible	le Property Su	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
T-4-I-						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Form **926**(Rev. November 2018)
Department of the Treasury

Return by a U.S. Transferor of Property to a Foreign Corporation

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

OMB No. 1545-0026

	al Revenue Service Attach to your income tax return	or the year of the transfer or dist	ribution.	Sequ	ience N	lo. Î	4 8
	rt I U.S. Transferor Information (see instructions)						
	of transferor		Identifying numb	er (se	e instru	ctions	s)
	enry County Community Foundation,		21 11704	1 2			
	ac.	to controlled fernion comparation?	31-11704		·/		NI =
1	Is the transferee a specified 10%-owned foreign corporation that is no			Ш '	Yes	Ш	No
	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 of						
а					Yes		No
h				\vdash	res Yes	=	No
J	If not, list the controlling shareholder(s) and their identifying number(s)				103		110
	(-),,,,,,						
	Controlling shareholder	Identify	ying number				
С	If the transferor was a member of an affiliated group filing a consolidat	-					
	corporation?			□ '	Yes		No
	If not, list the name and employer identification number (EIN) of the pa	rent corporation.					
	Name of parent corporation	EIN of par	rent corporation				
			-				
d	Have basis adjustments under section 367(a)(4) been made?				Yes	\Box	No
						ш	
3	If the transferor was a partner in a partnership that was the actual tran	sferor (but is not treated as such un	ider section 367),				
а	complete questions 3a through 3d. List the name and EIN of the transferor's partnership.						
u	Eist the hame and Ein of the transferor 5 particismp.						
	Name of partnership	EIN of	partnership				
7	Adamas Opportunities, L.P.	04-3	514360				
b	Did the partner pick up its pro rata share of gain on the transfer of part	nership 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 re						
	securities market?				Yes	X	No
	rt II Transferee Foreign Corporation Information (
4	Name of transferee (foreign corporation)		5a Identifying nun	ıber,	if any		
	MDPK-2018-30A Sub 04/15/2029						
6	Address (including country)		5b Reference ID nu	ımber			
	27 Hospital Rd		(see instructions)				
-	George Town CJ KY1-9008 Cayman Island	-					
1	Country code of country of incorporation or organization (see instruction ${\bf C}{\bf J}$	Jus)					
Q	Foreign law characterization (see instructions)						
O	Corporation						
۵	Is the transferee foreign corporation a controlled foreign corporation?				Yes	X	Nο
3							

Page	2
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Part III Informa	ation Regar	ding Transfer of Property (see	instructio	ons)		
Section A—Cash						
Type of property	(a) Date of transfer	(b) Description of property	ı	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash		Q		24		
•	emainder of Par	erred? t III and go to Part IV. than intangible property subject t				X Yes No
Type of	(a) Date of	(b) Description of		(c) Fair market 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						
foreign corporation If "Yes," go to line of the was the transferor (including a branch of "Yes," continue to the transferee foreign of the was a continue to the transferor the transferor to t	? 12b. a domestic cor that is a foreig b line 12c. If "No the transfer, was corporation? b line 12d. If "No ed loss amount ransfer propert	ch (including a branch that is a foreign d poration that transferred substantially all in disregarded entity) to a specified 10%- o," skip lines 12c and 12d, and go to line is the domestic corporation a U.S. sharef o," skip line 12d, and go to line 13. included in gross income as required un y described in section 367(d)(4)? ons 14a through 15.	of the as -owned fo 13. nolder with	sets of a foreign bra preign corporation? h respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangibl	e Property S	ubject to Section 367(d)	1			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals				i l		1

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	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.		
47	(a) Before % (b) After %		
17	Type of nonrecognition transaction (see instructions)		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		V N
a	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Form **926**(Rev. November 2018)
Department of the Treasury

Return by a U.S. Transferor of Property to a Foreign Corporation

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

OMB No. 1545-0026

Pai		or the year of the transfer or distribution.	Sequ	ience N	
		Γ			
	of transferor	Identifying nur	mber (see	e instru	ctions)
	enry County Community Foundation,	21 1150	410		
	nc.	31-1170			
	Is the transferee a specified 10%-owned foreign corporation that is no	a controlled foreign corporation?	∐ `	Yes	No
	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 of	ontrolled (under section 368(c)) by			
			🛏	Yes	No
			📙 🕻	Yes	No
	If not, list the controlling shareholder(s) and their identifying number(s)	•			
	Controlling charaholder	Identifying number			
	Controlling shareholder	Identifying number			
С	If the transferor was a member of an affiliated group filing a consolidat	ed return, was it the parent			
	corporation?			Yes	No
	If not, list the name and employer identification number (EIN) of the pa	rent corporation.			
	(=11) or and population (=11) or and population (=11)				
	Name of parent corneration	EIN of parent corporation			
	Name of parent corporation	EIN of parent corporation			
d	Have basis adjustments under section 367(a)(4) been made?		🔲 🕻	Yes	No No
			Ш	Yes	No No
3	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d.		Ш	Yes	No
3	If the transferor was a partner in a partnership that was the actual tran		Ш	Yes	No No
3	If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	sferor (but is not treated as such under section 367),	Ш	Yes	☐ No
3	If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d.		Ш	Yes	No No
3 a_	If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership	sferor (but is not treated as such under section 367), EIN of partnership	Ш	Yes	No
3 a A	If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P.	sferor (but is not treated as such under section 367), EIN of partnership 04-3514360	Ш	Yes	
3 a A	If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership	sferor (but is not treated as such under section 367), EIN of partnership 04-3514360		Yes Yes	X No
a A	If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P.	sferor (but is not treated as such under section 367), EIN of partnership 04-3514360			
a A	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is re	EIN of partnership 04-3514360 nership assets? gularly traded on an established		Yes	X No
a A	If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market?	EIN of partnership 04-3514360 nership assets?		Yes	X No
a A b c d	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions)		Yes Yes Yes	X No
a A b c d	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation)	EIN of partnership 04-3514360 nership assets?		Yes Yes Yes	X No
a A b c d	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Mido 2018–8A Inc 02/20/2031	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions)		Yes Yes Yes	X No
a A b c d	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation)	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions)	umber,	Yes Yes Yes	X No
a A b c d	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Mido 2018–8A Inc 02/20/2031	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions) 5a Identifying ne	umber,	Yes Yes Yes	X No
a A b c d	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? IT Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Mido 2018-8A Inc 02/20/2031 Address (including country) PO Box 1093 Grand Cayman CJ KY1-1102 Cayman Island	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions) 5a Identifying not (see instructions)	umber,	Yes Yes Yes	X No
3 a A A b c d Pau 4 6	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Mido 2018–8A Inc 02/20/2031 Address (including country) PO Box 1093 Grand Cayman CJ KY1–1102 Cayman Island Country code of country of incorporation or organization (see instruction)	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions) 5a Identifying not (see instructions)	umber,	Yes Yes Yes	X No
3 a A A b c d Pau 4 6	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? IT Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Mido 2018-8A Inc 02/20/2031 Address (including country) PO Box 1093 Grand Cayman CJ KY1-1102 Cayman Island	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions) 5a Identifying not (see instructions)	umber,	Yes Yes Yes	X No
3 a A b c d Pai 4	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Mido 2018-8A Inc 02/20/2031 Address (including country) PO Box 1093 Grand Cayman CJ KY1-1102 Cayman Island Country code of country of incorporation or organization (see instruction CJ Foreign law characterization (see instructions)	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions) 5a Identifying not (see instructions)	umber,	Yes Yes Yes	X No
3 a A b c d Pai 4	If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Mido 2018-8A Inc 02/20/2031 Address (including country) PO Box 1093 Grand Cayman CJ KY1-1102 Cayman Island Country code of country of incorporation or organization (see instruction CJ	EIN of partnership 04-3514360 nership assets? gularly traded on an established see instructions) 5a Identifying not (see instructions)	umber,	Yes Yes Yes	X No

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Page	_

	nation Regar	ding Transfer of Property (see	e instructi	ons)			
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	Gain recog	nized on
Cash	01/16/18			3	Baolo	traine	101
	emainder of Par	t III and go to Part IV.		207(4))		X Yes	☐ No
	roperty (otner (a)	than intangible property subjection (b)	t to section	on 367(a)) (c)	(d)	1 (0	,
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recog trans	nized on
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with							
built-in loss							
Totals							
(including a brance of "Yes," continue continue continue transferee foreign of "Yes," continue do Enter the transferor	12b. In a domestic corplet that is a foreign to line 12c. If "Not the transfer, was corporation?" It o line 12d. If "Not red loss amount transfer property	poration that transferred substantially an disregarded entity) to a specified 10° o," skip lines 12c and 12d, and go to lines the domestic corporation a U.S. share o," skip line 12d, and go to line 13. included in gross income as required to described in section 367(d)(4)?	all of the as %-owned fone 13. eholder wit	ssets of a foreign bra oreign corporation? th respect to the		Yes Yes Yes Yes	No No No No
Section C—Intangib	le Property Si	ubject to Section 367(d)					
	(a)	(b)	(c)	(d)	(e)	(f)	
Type of property	Date of transfer	Description of property	Useful life	Arm's length price on date of transfer	Cost or other basis	Income ir for year of (see inst	f transfer tructions)
Property described							
in sec. 367(d)(4)	+						
	+						
	+						-
	+						
 Totals							

Form **926** (Rev. 11-2018)

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	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.		
47	(a) Before % (b) After %		
17	Type of nonrecognition transaction (see instructions)		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		V N
a	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Form **926**(Rev. November 2018)
Department of the Treasury

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

Da		for the year of the transfer or distribution.	Sequence No. 128
	art I U.S. Transferor Information (see instructions)	Г	
	e of transferor	Identifying	number (see instructions)
	enry County Community Foundation,		70410
	nc.	31-11	
1	Is the transferee a specified 10%-owned foreign corporation that is no		Yes No
	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 of	controlled (under section 368(c)) by	
b			Yes No
	If not, list the controlling shareholder(s) and their identifying number(s)).	
	Ocartas Illiana ole cuele alden	I de maife din en manuels en m	
	Controlling shareholder	ldentifying number	
С	If the transferor was a member of an affiliated group filing a consolidat	ed return, was it the parent	
	corporation?	· · · · · · · · · · · · · · · · · · ·	Yes No
	If not, list the name and employer identification number (EIN) of the pa		
	in not, list the name and employer identification number (Liny) of the pe	arent corporation.	
	Name of warment as we sent to a	FIN of a count course	!
	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 tran	sferor (but is not treated as such under section 3	8 7)
3	complete questions 3a through 3d.	sieror (but is not treated as such under section s	or),
а	List the name and EIN of the transferor's partnership.		
	Name of partnership	EIN of partnership	
7	Adamas Opportunities, L.P.	04-3514360	
		04-3514360	Yes X No
b	Adamas Opportunities, L.P.	04-3514360	Yes X No
b c	Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part	04-3514360 thership assets?	
b c	Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is re	04-3514360 tnership assets? gularly traded on an established	
b c d	Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership?	04-3514360 tnership assets? gularly traded on an established	Yes X No
b c d	Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market?	04-3514360 tnership assets? gularly traded on an established see instructions)	Yes X No
b c d	Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (04-3514360 tnership assets? gularly traded on an established see instructions)	Yes X No
b c d	Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation)	04-3514360 tnership assets? gularly traded on an established see instructions)	Yes X No Yes X No g number, if any
b c d	Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Oct39 2018-3A Sub 10/20/2030	nership assets? gularly traded on an established see instructions) 5a Identifyin	Yes X No Yes X No g number, if any
b c d	Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Oct39 2018-3A Sub 10/20/2030 Address (including country)	04-3514360 tnership assets? gularly traded on an established see instructions) 5a Identifyin 5b Reference (see instruction)	Yes X No Yes X No g number, if any
b c d	Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Oct39 2018-3A Sub 10/20/2030 Address (including country) PO Box 1093	nership assets? gularly traded on an established see instructions) 5a Identifyin 5b Reference (see instructions)	Yes X No Yes X No g number, if any
b c d	Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Oct39 2018-3A Sub 10/20/2030 Address (including country) PO Box 1093 Grand Cayman CJ KY1-1102 Cayman Island	nership assets? gularly traded on an established see instructions) 5a Identifyin 5b Reference (see instructions)	Yes X No Yes X No g number, if any
Pa 4 6	Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Oct39 2018-3A Sub 10/20/2030 Address (including country) PO Box 1093 Grand Cayman CJ KY1-1102 Cayman Island Country code of country of incorporation or organization (see instruction)	nership assets? gularly traded on an established see instructions) 5a Identifyin 5b Reference (see instructions)	Yes X No Yes X No g number, if any
Pa 4 6	Adamas Opportunities, L.P. Did the partner pick up its pro rata share of gain on the transfer of part Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is resecurities market? Transferee Foreign Corporation Information (Name of transferee (foreign corporation) Oct39 2018-3A Sub 10/20/2030 Address (including country) PO Box 1093 Grand Cayman CJ KY1-1102 Cayman Island Country code of country of incorporation or organization (see instruction CJ	nership assets? gularly traded on an established see instructions) 5a Identifyin 5b Reference (see instructions)	Yes X No Yes X No g number, if any

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Page	_

	ation Regard	ding Transfer of Property (see	instruction	ons)		
Section A—Cash Type of property	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
Cash	transfer 10/19/18	property		date of transfer	basis	transfer
	emainder of Part	III and go to Part IV.				X Yes No
		than intangible property subject	to section		(4)	(-)
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 If "Yes," continue t c Immediately after transferee foreign If "Yes," continue t d Enter the transferr	12b. r a domestic corp h that is a foreigr to line 12c. If "No the transfer, was corporation? to line 12d. If "No ed loss amount i transfer property	," skip line 12d, and go to line 13. ncluded in gross income as required ur described in section 367(d)(4)?	I of the as -owned for e 13. holder wit	ssets of a foreign brain oreign corporation? The respect to the second or the second		Yes No Yes No Yes No
Section C—Intangib	le Property Su	ubject to Section 367(d)				
Coolion C—mangib	(a)	(b)	(c)	(d)	(e)	(f)
Type of property	Date of transfer	Description of property	Useful life	Arm's length price on date of transfer	Cost or other basis	Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	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.		
47	(a) Before % (b) After %		
17	Type of nonrecognition transaction (see instructions)		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		V N
a	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

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

Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any Octagon Investment Partners 39, Ltd 5b Reference ID number Address (including country) PO Box 1093 (see instructions) Grand Cayman CJ KY1-1102 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation

Is the transferee foreign corporation a controlled foreign corporation?

Page	2
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Part III Informa	ation Rega	rding Transfer of Property (see i	nstructi	ons)			
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 recognize transfer	ed on
Cash	10/19/2	20		107			
•	mainder of Pa	rt III and go to Part IV.				X Yes	No
		r than intangible property subject t	o secti		/d\	(o)	
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 recognize transfer	ed on
Stock and securities							
Inventory							
Other property (not listed under another category)							
Property with built-in loss							
Totals							
recognition agreem 12a Were any assets of foreign corporation of the foreign corporation of the foreign corporation of the foreign continue to the fo	nent was filed? If a foreign brain Italia I	rporation that transferred substantially all gn disregarded entity) to a specified 10%-(lo," skip lines 12c and 12d, and go to line as the domestic corporation a U.S. shareh	of the as owned fo 13. older wit	ed entity) transferred essets of a foreign bra preign corporation? h respect to the	to a nch	Yes Yes Yes Yes Yes Yes	No No No No
Section C—Intangible	e Property S	Subject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclustor year of train (see instruct	nsfer
Property described in sec. 367(d)(4)							
i otalo							

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Return by a U.S. Transferor of Property to a Foreign Corporation

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

OMB No. 1545-0026

Attachment

▶ Attach to your income tax return for the year of the transfer or distribution. Sequence No. 128 Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any OFSI BSL IX - Fee Letter Address (including country) 5b Reference ID number PO Box 1093 (see instructions) Grand Cayman CJ KY1-1102 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions)

Is the transferee foreign corporation a controlled foreign corporation?

Corporation

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Page	_

Part III Inform Section A—Cash	ation Regard	ling Transfer of Property (see	instructi	ons)		
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	06/21/18			7		
10 Was cash the only If "Yes," skip the re		rred? III and go to Part IV.				X Yes No
Section B—Other Pr		than intangible property subject	to section			-
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						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
(including a branch of "Yes," continue to transferee foreign of "Yes," continue to the transferre foreign of the transferre transferre transferre transferre transferre transferre transferre foreign of the transferre transferre transferre transferre transferre foreign of the transferre	12b. r a domestic corp h that is a foreign to line 12c. If "No the transfer, was corporation? to line 12d. If "No red loss amount in transfer property	," skip line 12d, and go to line 13. ncluded in gross income as required un described in section 367(d)(4)?	ll of the as o-owned for e 13. holder wit	ssets of a foreign brai preign corporation? h respect to the		Yes No Yes No Yes No
Section C—Intangib	le Property Su	bject to Section 367(d)				
- Coolion C Intungib	(a)	(b)	(c)	(d)	(e)	(f)
Type of property	Date of transfer	Description of property	Useful life	Arm's length price on date of transfer	Cost or other basis	Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Return by a U.S. Transferor of Property to a Foreign Corporation

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

OMB No. 1545-0026

Attachment

▶ Attach to your income tax return for the year of the transfer or distribution. Sequence No. 128 Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) 5a Identifying number, if any Rockford Tower CLO 2019-2 Address (including country) 5b Reference ID number Cayman Corporate Centre (see instructions) CJ KY1-9008 Country code of country of incorporation or organization (see instructions)

Is the transferee foreign corporation a controlled foreign corporation?

Foreign law characterization (see instructions)

Corporation

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Page	_

	ation Regard	ding Transfer of Property (see	instructi	ons)		
Section A—Cash Type of	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
property Cash	transfer	property		date of transfer	basis	transfer
10 Was cash the only If "Yes," skip the re	emainder of Part	III and go to Part IV.				X Yes No
	operty (other to (a)	than intangible property subject (b)	to section	on 367(d)) (c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	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 b Was the transferor (including a branch If "Yes," continue to c Immediately after transferee foreign If "Yes," continue to d Enter the transferr	n? 12b. r a domestic corp h that is a foreign to line 12c. If "No the transfer, was corporation? to line 12d. If "No ed loss amount in transfer property	," skip line 12d, and go to line 13. ncluded in gross income as required undescribed in section 367(d)(4)?	II of the as s-owned for e 13. sholder wit	esets of a foreign brain preign corporation? The respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Su	bject to Section 367(d)				-
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

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

Sequence No. 128

Attachment

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is no	t a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor	controlled (under section 368(c)) by
	Yes No
	Yes No
If not, list the controlling shareholder(s) and their identifying number(s).
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidar corporation?	·
If not, list the name and employer identification number (EIN) of the pa	
ii not, not the name and employer identification number (Lint) of the pa	
. , , , ,	irent corporation.
Name of parent corporation	EIN of parent corporation
	EIN of parent corporation
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. 	EIN of parent corporation Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	EIN of parent corporation Yes No sferor (but is not treated as such under section 367),
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. 	EIN of parent corporation Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P.	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360
d Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 mership assets? Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of parts the partner disposing of its entire interest in the partnership?	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 Inership assets? Yes X No Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of parts 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 reserved.	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 Intership assets? Yes X No Yes X No Gularly traded on an established
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of parts the partner disposing of its entire interest in the partnership?	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 Inership assets? Yes X No Yes X No gularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market?	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 Inership assets? Yes X No Yes X No gularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of parts the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is resecurities market? Part II Transferee Foreign Corporation Information (1997)	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 Intership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (4)	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 Intership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (A) Name of transferee (foreign corporation) Rockford Tower CLO 2020-1	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 Inership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (Answer CLO 2020-1) 6 Address (including country)	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 Intership assets? Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (Answer CLO 2020-1) 6 Address (including country) Cayman Corporate Centre	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 Intership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of particles to the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is resecurities market? Part II Transferee Foreign Corporation Information (And Name of transferee (foreign corporation) Rockford Tower CLO 2020-1 6 Address (including country) Cayman Corporate Centre George Town CJ KY1-9008 Cayman Island 7 Country code of country of incorporation or organization (see instructions) 8 Foreign law characterization (see instructions)	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 Intership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of particles to the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is resecurities market? Part II Transferee Foreign Corporation Information (Angular Mame of transferee (foreign corporation) Rockford Tower CLO 2020-1 6 Address (including country) Cayman Corporate Centre George Town CJ KY1-9008 Cayman Island COuntry code of country of incorporation or organization (see instruction)	EIN of parent corporation Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 Intership assets? Yes X No yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)

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	ation Regard	ling Transfer of Property (see	instruction	ons)		
Section A—Cash Type of	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
property Cash	transfer	property		date of transfer	basis	transfer
10 Was cash the only If "Yes," skip the re	emainder of Part	III and go to Part IV.				X Yes No
	operty (otner t	than intangible property subject (b)	to section	on 367(a)) (c)	(d)	(e)
Type of property	Date of transfer	Description of property	1	Fair market value on date of transfer	Cost or other basis	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 b Was the transferor (including a branch If "Yes," continue t c Immediately after t transferee foreign If "Yes," continue t d Enter the transferor	n? 12b. r a domestic corp n that is a foreign to line 12c. If "No, the transfer, was corporation? to line 12d. If "No, ed loss amount ir	," skip line 12d, and go to line 13. ncluded in gross income as required ur described in section 367(d)(4)?	I of the as -owned fo e 13. holder wit	sets of a foreign brain preign corporation?	nch	Yes
Section C—Intangib	le Property Su	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						
iotaio				<u>ı </u>		<u> </u>

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

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

Interr	nal Revenue Service	► Attach to your income tax return	for the year of the transfer or dis	stribution.	Se	quence	No. ′	<u> 128</u>
Pa	art I U.S. Tran	sferor Information (see instructions)						
	e of transferor	Community Foundation,		Identifying num	oer (s	ee instr	uctior	ns)
	nc.	community realisactory		31-11704	12			
1 2 a	Is the transferee a spell the transferor was a self the transfer was a selfive or fewer domestic Did the transferor rem	· · · · · · · · · · · · · · · · · · ·	controlled (under section 368(c)) b	у		Yes Yes Yes		No No No
	C	ontrolling shareholder	Identi	ifying number				
	corporation?	n member of an affiliated group filing a consolida	·			Yes		No
	Nai	me of parent corporation	EIN of p	arent corporation				
	Have basis adjustmer	nts under section 367(a)(4) been made?				Yes		No
3	If the transferor was a complete questions 3	partner in a partnership that was the actual trar	nsferor (but is not treated as such ເ			163		140
		Name of partnership	EIN c	of partnership				
	Adamad Oppo	rtunities, L.P.	04-	3514360				
b	Did the partner pick u Is the partner disposin Is the partner disposin	p its pro rata share of gain on the transfer of paring of its entire interest in the partnership? ng of an interest in a limited partnership that is re	tnership assets?	3314300		Yes Yes	X	No No
Dr	securities market?	ee Foreign Corporation Information	(coo instructions)			Yes	X	No
4	Name of transferee (f		(355 111311 45110113)	5a Identifying nui	nho	if any		
-		ower CLO 2020-2		Ja luentilying hui	IIDEI	, ii aiiy		
7	Address (including co Cayman Corporate George Town Country code of coun	untry)	-	5b Reference ID n (see instructions)	umbe	er E		
	CJ							
8	Corporation	rization (see instructions) n						
9		gn corporation a controlled foreign corporation?				Yes	X	No

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	ation Regar	ding Transfer of Property (see	instruction	ons)			
Section A—Cash	(a)	(b)		(c)	(d)	(e)	
Type of property	Date of	Description of	ı	(c) Fair market value on	Cost or other	Gain recog	
Cash	transfer	property		date of transfer	basis	trans	ICI
10 Was cash the only If "Yes," skip the re	emainder of Par	t III and go to Part IV.				X Yes	☐ No
Section B—Other Pr	operty (other	than intangible property subject	to sectio	on 367(d))			
Type of property	(a) Date of transfer	(b) Description of property	ı	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recog trans	
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with built-in loss							
Totals							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue t c Immediately after t transferee foreign If "Yes," continue t d Enter the transferor 13 Did the transferor	of a foreign branch? 12b. 12b. 1a domestic corn that is a foreign on line 12c. If "Nother transfer, was corporation? 10 line 12d. If "Nother loss amount transfer property	poration that transferred substantially all n disregarded entity) to a specified 10% o," skip lines 12c and 12d, and go to line is the domestic corporation a U.S. sharel o," skip line 12d, and go to line 13. included in gross income as required urly described in section 367(d)(4)?	I of the as -owned fo 13. holder with	sets of a foreign bra preign corporation? In respect to the	nch	Yes Yes Yes Yes	No No No No No
Section C—Intangib	le Property S	ubject to Section 367(d)	η-				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income in for year of (see inst	transfer
Property described in sec. 367(d)(4)							
 Totals							

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

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. 1

	rt I U.S. Transferor Information (see instructions)	or the year of the transfer or distr	Sequer	ice No. 120
	of transferor		Identifying number (coo is	actructions)
	enry County Community Foundation,		Identifying number (see in	istructions)
	nc.		31-1170412	
	Is the transferee a specified 10%-owned foreign corporation that is not	t a controlled foreign corporation?	Ye	s No
	If the transferor was a corporation, complete questions 2a through 2d.	• •		5 _ 110
	If the transfer was a section 361(a) or (b) transfer, was the transfer or			
u			Ye	s No
h				
~	If not, list the controlling shareholder(s) and their identifying number(s)		🗀 10	
	Controlling shareholder	Identify	ing number	
С	If the transferor was a member of an affiliated group filing a consolidat	ed return, was it the parent		
	corporation?		Ye	s No
	If not, list the name and employer identification number (EIN) of the pa	rent corporation.		
		<u> </u>		
	Name of parent corporation	EIN of par	ent corporation	
		0. pa.		
- A	Have basis adjustments under section 367(a)(4) been made?		Ye	s No
				5 110
3	If the transferor was a partner in a partnership that was the actual tran	sferor (but is not treated as such un	der section 367),	
_	complete questions 3a through 3d.			
а	List the name and EIN of the transferor's partnership.			
	Name of partnership	EIN of	partnership	
7	Adamas Opportunities, L.P.	04-3	514360	
	Did the partner pick up its pro rata share of gain on the transfer of part		V.	s X No
	Is the partner disposing of its entire interest in the partnership?		Ye	==
	Is the partner disposing of an interest in a limited partnership that is re	gularly traded on an established	🗀 🕶	
_	securities market?		Ye	s X No
Pa	rt II Transferee Foreign Corporation Information (
	Name of transferee (foreign corporation)		a Identifying number, if a	any
	Rockford Tower Europe 2 DAC			
6	Address (including country)	5	b Reference ID number	
	Cayman Corporate Centre	(9	see instructions)	
	George Town CJ KY1-9008 Cayman Island	ls		
7	Country code of country of incorporation or organization (see instruction	ons)		
	CJ			
8	Foreign law characterization (see instructions)			
	Corporation			
۵	Is the transferee foreign corporation a controlled foreign corporation?		Ye	s X No

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Part III Inform Section A—Cash	ation Regardi	ng Transfer of Property (see	instructi	ons)		
Type of property	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
Cash	transfer 0	property		date of transfer 1,147	basis	transfer
	emainder of Part II	I and go to Part IV.		207(4))		X Yes No
Type of	operty (other tr	nan intangible property subject (b)	to section	(c)	(d)	(e)
property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Stock and	transisi	ргорону		date of transfer	bacic	transion
securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to c Immediately after to transferee foreign If "Yes," continue to d Enter the transferor	n? 12b. r a domestic corpo n that is a foreign o o line 12c. If "No," the transfer, was th corporation? o line 12d. If "No," ed loss amount ind transfer property d	skip line 12d, and go to line 13. cluded in gross income as required unlescribed in section 367(d)(4)?	II of the as 6-owned for e 13. Pholder wit	sets of a foreign brain preign corporation? The respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangible	le Property Sub	ject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

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. 1

	or the year of the transfer or distribution. Sequence No. 128
Part I U.S. Transferor Information (see instructions)	I
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is not	a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor of	ontrolled (under section 368(c)) by
five or fewer domestic corporations?	Yes No
1 5:10 1 6 1:11 6 0 1 6 0	Yes No
If not, list the controlling shareholder(s) and their identifying number(s)	
Controlling shareholder	Identifying number
e If the transferer was a member of an affiliated group filing a consolidat	ad return, was it the parent
c If the transferor was a member of an affiliated group filing a consolidate	
corporation?	
If not, list the name and employer identification number (EIN) of the pa	rent corporation.
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(4) been made?	Yes No
u Trave basis adjustifients under section 307(a)(4) been made:	i tes i No
3 If the transferor was a partner in a partnership that was the actual trans	sferor (but is not treated as such under section 367),
complete questions 3a through 3d.	
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
·	·
Adamag Opportunition I D	04-3514360
Adamas Opportunities, L.P.	
b Did the partner pick up its pro rata share of gain on the transfer of part	
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 re	
securities market?	
Part II Transferee Foreign Corporation Information (
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Rockford Tower Europe 3 DAC	
6 Address (including country)	5b Reference ID number
Cayman Corporate Centre	5b Reference ID number (see instructions)
Cayman Corporate Centre George Town CJ KY1-9008 Cayman Island	5b Reference ID number (see instructions)
Cayman Corporate Centre George Town CJ KY1-9008 Cayman Island 7 Country code of country of incorporation or organization (see instruction)	5b Reference ID number (see instructions)
Cayman Corporate Centre George Town CJ KY1-9008 Cayman Island Country code of country of incorporation or organization (see instruction CJ	5b Reference ID number (see instructions)
Cayman Corporate Centre George Town CJ KY1-9008 Cayman Island Country code of country of incorporation or organization (see instruction CJ 8 Foreign law characterization (see instructions)	5b Reference ID number (see instructions)
Cayman Corporate Centre George Town CJ KY1-9008 Cayman Island Country code of country of incorporation or organization (see instruction CJ	5b Reference ID number (see instructions) sens)

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	ation Regard	ling Transfer of Property (see	instruction	ons)		
Section A—Cash Type of property	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
Cash	transfer 0	property		date of transfer	basis	transfer
10 Was cash the only If "Yes," skip the re	emainder of Part	III and go to Part IV.				X Yes No
	operty (otner t	than intangible property subject (b)	to section	(c)	(d)	(e)
Type of property	Date of transfer	Description of property		Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Stock and						
securities						
Inventory	1					
Other property (not listed under another category)						
-						
Property with						
built-in loss						
Totals						
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue t c Immediately after t transferee foreign If "Yes," continue t d Enter the transferor	n? 12b. r a domestic corp n that is a foreign to line 12c. If "No, the transfer, was corporation? to line 12d. If "No, ed loss amount ir	," skip line 12d, and go to line 13. ncluded in gross income as required ur described in section 367(d)(4)?	l of the as -owned fo e 13. holder wit	ssets of a foreign brain preign corporation? The respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Su	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Tatala						
Totals				<u> </u>		

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

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

Sequence No. 128

Attachment

Intern	al Revenue Service	Attach to your income tax return	for the year of the transfer or dis	stribution.	Se	quence	No. ′	<u> 128</u>
Pa	ırt I U.S. Tran	nsferor Information (see instructions)						
	e of transferor			Identifying numl	er (s	ee instr	uctior	ns)
He	enry County	Community Foundation,						
<u>I</u> 1	nc.			31-11704	<u>12</u>			
1	·	ecified 10%-owned foreign corporation that is no	t a controlled foreign corporation?			Yes		No
		a corporation, complete questions 2a through 2d.						
а		section 361(a) or (b) transfer, was the transferor	controlled (under section 368(c)) b	у				
	five or fewer domestic				Ш	Yes	Ц	No
b					Ш	Yes		No
	If not, list the controlli	ng shareholder(s) and their identifying number(s).					
	C	Controlling shareholder	Identi	ifying number				
		Total Ching Shareholder	Tuesta.	nymg namber				
С	If the transferor was a	a member of an affiliated group filing a consolidat	ed return, was it the parent					
			•			Yes		No
	If not list the name ar	nd employer identification number (EIN) of the pa	arent corporation					
-	ii not, not the name ar	The employer recritimodical flumbor (Emy) of the pe	arent corporation.					
	Na	me of parent corporation	EIN of p	arent corporation				
	INGI	me or parent corporation	LIN OI p	arent corporation				
d	Have basis adjustmer	nts under section 367(a)(4) been made?				Yes		No
3	If the transferor was a	a partner in a partnership that was the actual tran	sferor (but is not treated as such ເ	under section 367),				
	complete questions 3	<u> </u>						
<u>a</u>	List the name and EIN	N of the transferor's partnership.						
		Name of partnership	EIN o	of partnership				
		·						
7	Adamas Oppo	rtunities, L.P.	04-	3514360				
		p its pro rata share of gain on the transfer of part				Yes	X	No
		ng of its entire interest in the partnership?			H	Yes	X	No
	· ·	ng of an interest in a limited partnership that is re	gularly traded on an established		Ш			
ű			guidity traded on an established			Yes	X	No
Pa	rt II Transfere	ee Foreign Corporation Information (see instructions)					
4	Name of transferee (f	<u> </u>		5a Identifying nur	nber	, if any		
		nvestments IV Sarl		98-11460				
6	Address (including co			5b Reference ID n	umbe	er		
	6D Route De Trev	• •		(see instructions)				
	Senningerberg	LU Luxembourg						
7	Country code of coun	try of incorporation or organization (see instruction	ons)		_		_	_
-	LU							
8	_	rization (see instructions)						
	Corporation						-	
9	Is the transferee forei	gn corporation a controlled foreign corporation?				Yes	X	No

Page ∠

	ation Regar	<mark>ding Transfer of Property</mark> (see	e instructi	ons)			
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	Gain recog	gnized on
Cash	transion	o property		12	Bacio	T Grant	7101
	emainder of Par	rt III and go to Part IV.				X Yes	☐ No
		than intangible property subject	to section		(4)	1 /2	
Type of property	(a) Date of transfer	(b) Description of property		(c) Fair market value on date of transfer	(d) Cost or other basis	Gain recog trans	nized on
Stock and							
securities							
Inventory						<u> </u>	
Other property (not listed under another category)							
Property with built-in loss							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	n? 12b. r a domestic con n that is a foreig to line 12c. If "N the transfer, wa corporation? to line 12d. If "N ed loss amount transfer propert	rporation that transferred substantially a gn disregarded entity) to a specified 10% o," skip lines 12c and 12d, and go to lin s the domestic corporation a U.S. share lo," skip line 12d, and go to line 13. included in gross income as required u y described in section 367(d)(4)?	all of the as 6-owned for e 13. eholder wit	sets of a foreign bra preign corporation? h respect to the	nch	Yes Yes Yes	No No No No
Section C—Intangib	le Property S	ubject to Section 367(d)	ı				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	Income in for year of (see inst	nclusion
Property described in sec. 367(d)(4)							
Totals							
iolais				ı		1	

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

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

Intern	al Revenue Service	Attach to your income tax return	for the year of the transfer or dis	tribution.	Se	quence	No.	128
Pa	rt I U.S. Trar	nsferor Information (see instructions)						
	e of transferor enry County	Community Foundation,		Identifying num	ber (s	see instr	uction	ns)
<u>I</u> 1	nc.			31-11704	12			
а	If the transferor was a sifty or fewer domestic Did the transferor rem		controlled (under section 368(c)) by			Yes Yes Yes		No No No
	c	Controlling shareholder	Identi	fying number				
	corporation?	a member of an affiliated group filing a consolidated	·		. [Yes		No
		me of parent corporation		arent corporation				
d	Have basis adjustment	nts under section 367(a)(4) been made?				Yes		No
	complete questions 3	a partner in a partnership that was the actual tran a through 3d. N of the transferor's partnership.	nsferor (but is not treated as such u	nder section 367),				
		Name of partnership	EIN o	f partnership				
7	Adamas Oppo	rtunities, L.P.	04-	3514360				
b	Did the partner pick u Is the partner disposit Is the partner disposit	p its pro rata share of gain on the transfer of partnershin?	tnership assets?			Yes Yes	XX	No No
Pa		ee Foreign Corporation Information ((see instructions)					
4	Name of transferee (f			5a Identifying nu	mbe	r, if any		
7	Address (including co PO Box 1093 Grand Cayman Country code of coun			5b Reference ID n (see instructions)	umb	er		
8	Foreign law character Corporation	rization (see instructions)						
9		ign corporation a controlled foreign corporation?				Yes	X	No

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Part III Inform Section A—Cash	nation Regard	ing Transfer of Property (see	instructi	ons)		
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	05/17/01	property		2	Sacio	uanoo
10 Was cash the only If "Yes," skip the r	· · · ·	red? II and go to Part IV.				X Yes No
Section B—Other Pr		han intangible property subject	to section			_
Type of property	(a) Date of transfer	(b) Description of property	1	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and						
securities Inventory						
inventory						
Other property (not listed under another category)						
Property with built-in loss						
Duiit-iii ioss						
foreign corporation If "Yes," go to line b Was the transfero (including a branc If "Yes," continue c Immediately after transferee foreign If "Yes," continue d Enter the transferi	n? 12b. r a domestic corport that is a foreign to line 12c. If "No," the transfer, was a corporation? to line 12d. If "No, red loss amount in transfer property of	" skip line 12d, and go to line 13. cluded in gross income as required ur described in section 367(d)(4)?	l of the as -owned fo e 13. nolder wit	sets of a foreign brai preign corporation? h respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Sul	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
		-			-	
Property described in sec. 367(d)(4)						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

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

Sequence No. 128

Attachment

Intern	al Revenue Service	Attach to your income tax return	for the year of the transfer or dis	tribution.	Se	quence	No. ′	<u> 128</u>
Pa	rt I U.S. Tran	nsferor Information (see instructions)						
	of transferor	Community Foundation		Identifying numb	er (s	ee instr	uction	ns)
		Community Foundation,		31-11704	1 2			
1 2 a	If the transferor was a s If the transfer was a s five or fewer domestic Did the transferor rem	ii	controlled (under section 368(c)) by	,		Yes Yes Yes		No No No
	С	Controlling shareholder	Identi	fying number				
	corporation?	a member of an affiliated group filing a consolidat	·			Yes		No
	Nai	me of parent corporation	EIN of pa	rent corporation				
	Have basis adjustmen	nts under section 367(a)(4) been made?				Yes		No
3	If the transferor was a complete questions 3.	a partner in a partnership that was the actual tran	sferor (but is not treated as such u			res		NO
		Name of partnership	EIN o	f partnership				
z	Adamas Oppo	rtunities, L.P.	04-	3514360				
		p its pro rata share of gain on the transfer of part	1: 10	3314300	П	Yes	X	No
		ng of its entire interest in the partnership?			Ħ	Yes	X	No
	· · · · · · · · · · · · · · · · · · ·	ng of an interest in a limited partnership that is re						
	securities market?				П	Yes	X	No
Pa	rt II Transfere	ee Foreign Corporation Information (see instructions)					
4	Name of transferee (f	oreign corporation)		5a Identifying nun	nber	, if any		
	TRAL 2018-	5A Sub 10/20/2028						
6	Address (including co	ountry)		5b Reference ID nu	ımbe	er		
	PO Box 1093			(see instructions)				
	Grand Cayman	CJ KY1-1102 Cayman Island	ls	·				
	Country code of coun	try of incorporation or organization (see instruction	ons)					
		rization (see instructions)						
•	Corporation	,						
9		gn corporation a controlled foreign corporation?				Yes	X	No

Page	2
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Part III Informa	ation Rega	rding Transfer of Property (see i	nstruction	ons)			
Section A—Cash							
Type of property	(a) Date of transfer	(b) Description of property	ı	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized transfer	d on
Cash	10/04/1	.8		147			
	emainder of Pa	rt III and go to Part IV.				X Yes	No
•	operty (otne (a)	r than intangible property subject t	o sectio	on 367(d)) (c)	(d)	(e)	
Type of property	Date of transfer	Description of property	ı	Fair market value on date of transfer	Cost or other basis	Gain recognized transfer	d on
Stock and							
securities							
Inventory							
Other property (not listed under another category)							
Property with							
built-in loss							
Totals							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to c Immediately after t transferee foreign of If "Yes," continue to d Enter the transferor 13 Did the transferor	of a foreign braining 12b. 12b. 12b. 1 domestic connection that is a foreign 1 line 12c. If "Note transfer, was 1 corporation? 1 line 12d. If "Note loss amount 1 cransfer proper	proporation that transferred substantially all gn disregarded entity) to a specified 10%-lo," skip lines 12c and 12d, and go to line as the domestic corporation a U.S. shareh loo," skip line 12d, and go to line 13. It included in gross income as required unoty described in section 367(d)(4)?	of the as owned fo 13. older with	sets of a foreign braceign corporation?	to a	Yes Yes Yes Yes Yes	No No No No
Section C—Intangibl	le Property S	Subject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusi for year of trans (see instruction	sfer
Property described in sec. 367(d)(4)							
Totals							_

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	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.		
47	(a) Before % (b) After %		
17	Type of nonrecognition transaction (see instructions)		
18	Indicate whether any transfer reported in Part III is subject to any of the following.	□ v.	V N
a	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Return by a U.S. Transferor of Property to a Foreign Corporation

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

OMB No. 1545-0026

Attachment

▶ Attach to your income tax return for the year of the transfer or distribution. Sequence No. 128 Internal Revenue Service Part I U.S. Transferor Information (see instructions) Name of transferor Identifying number (see instructions) Henry County Community Foundation, 31-1170412 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No **b** Did the transferor remain in existence after the transfer? Yes No If not, list the controlling shareholder(s) and their identifying number(s). Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation. Name of parent corporation **EIN** of parent corporation d Have basis adjustments under section 367(a)(4) been made? No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. **a** List the name and EIN of the transferor's partnership. Name of partnership EIN of partnership Adamas Opportunities, L.P. **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No c Is the partner disposing of its entire interest in the partnership? X No Yes d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 5a Identifying number, if any Ventr 2013-15A 98-1389051 5b Reference ID number Address (including country) PO Box 1093 (see instructions) Grand Cayman CJ KY1-1102 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) Corporation

Is the transferee foreign corporation a controlled foreign corporation?

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Page	_

Part III Inform Section A—Cash	ation Regard	ding Transfer of Property (see	instructi	ons)		
Type of property	(a) Date of	(b) Description of		(c) Fair market value on date of transfer	(d) Cost or other	(e) Gain recognized on
Cash	transfer 01/31/18	property		18	basis	transfer
10 Was cash the only If "Yes," skip the re		erred? III and go to Part IV.				🗓 Yes 🗌 No
Section B—Other Pr		than intangible property subject	to secti			
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 b Was the transferor (including a branch If "Yes," continue t c Immediately after t transferee foreign If "Yes," continue t d Enter the transferor	n? 12b. r a domestic corp n that is a foreign to line 12c. If "No the transfer, was corporation? to line 12d. If "No ed loss amount it	," skip line 12d, and go to line 13. ncluded in gross income as required un described in section 367(d)(4)?	of the as owned for 13. nolder wit	ssets of a foreign brai preign corporation? th respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le Property Su	bject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	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.		
47	(a) Before % (b) After %		
17	Type of nonrecognition transaction (see instructions)		
18	Indicate whether any transfer reported in Part III is subject to any of the following.	□ v.	V N
a	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

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

Attachment Sequence No. 128

	feror Information (see instructions)			
Name of transferor			Identifying number (see	e instructions)
	Community Foundation,			
Inc.			31-1170412	
1 Is the transferee a spec	ified 10%-owned foreign corporation that is no	t a controlled foreign corporation?	······ '	Yes No
	corporation, complete questions 2a through 2d			
	ction 361(a) or (b) transfer, was the transferor	controlled (under section 368(c)) by		
five or fewer domestic of			······ <u></u> `	Yes No
			····· 📙 🕻	Yes No
If not, list the controlling	shareholder(s) and their identifying number(s).		
Col	ntrolling shareholder	identityin	ig number	
	nember of an affiliated group filing a consolida	-		_
corporation?			······ '	Yes No
If not, list the name and	employer identification number (EIN) of the pa	arent corporation.		
		•		
Name	e of parent corporation	EIN of paren	nt corporation	
Name	e of parent corporation	EIN of paren	nt corporation	
Name	e of parent corporation	EIN of paren	nt corporation	
	1: 007/ VAV	·		Ves Ne
	1: 007/ VAV	EIN of paren		Yes No
d Have basis adjustments3 If the transferor was a p	s under section 367(a)(4) been made?			Yes No
d Have basis adjustments3 If the transferor was a p complete questions 3a	s under section 367(a)(4) been made?			Yes No
d Have basis adjustments3 If the transferor was a p complete questions 3a	s under section 367(a)(4) been made?			Yes No
d Have basis adjustments If the transferor was a property complete questions 3a and a List the name and EIN of	s under section 367(a)(4) been made? partner in a partnership that was the actual trar through 3d. of the transferor's partnership.	sferor (but is not treated as such unde	er section 367),	Yes No
d Have basis adjustments If the transferor was a property complete questions 3a and a List the name and EIN of	s under section 367(a)(4) been made?	sferor (but is not treated as such unde		Yes No
d Have basis adjustments If the transferor was a p complete questions 3a a List the name and EIN o	s under section 367(a)(4) been made?	sferor (but is not treated as such unde	er section 367),	Yes No
d Have basis adjustments If the transferor was a promplete questions 3 are a List the name and EIN or N Adamas Oppor	s under section 367(a)(4) been made? partner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P.	sferor (but is not treated as such unde	er section 367), ertnership 14360	
d Have basis adjustments 3 If the transferor was a promplete questions 3 at a List the name and EIN of th	s under section 367(a)(4) been made? partner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of par	sferor (but is not treated as such unde	er section 367), artnership 14360	Yes X No
d Have basis adjustments If the transferor was a promplete questions 3 are a List the name and EIN of the partner pick up b Did the partner disposing	s under section 367(a)(4) been made?	sferor (but is not treated as such unde EIN of pa 04-35:	er section 367), artnership 14360	
d Have basis adjustments If the transferor was a promplete questions 3 at a List the name and EIN of the name and EIN of the partner pick up to be be be be at the partner disposing d is the partner disposing d is the partner disposing	s under section 367(a)(4) been made? partner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of part of its entire interest in the partnership? of an interest in a limited partnership that is reserved.	sferor (but is not treated as such unde EIN of pa 04-35: enership assets? gularly traded on an established	er section 367), artnership 14360	Yes X No Yes X No
d Have basis adjustments If the transferor was a promplete questions 3 at a List the name and EIN of the partner pick up to b Did the partner disposing d Is the partner disposing securities market?	s under section 367(a)(4) been made? partner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of part of its entire interest in the partnership? of an interest in a limited partnership that is reserved.	sferor (but is not treated as such under EIN of pa 04-35: enership assets? gularly traded on an established	er section 367), artnership 14360	Yes X No
d Have basis adjustments 3 If the transferor was a promplete questions 3 at a List the name and EIN of the North Market Part II Transfered d Have basis adjustments A promplete questions 3 at a promplete questions 3 at a list the name and EIN of the North Market Part II Transfered 3 If the transfered Have a promplete questions and EIN of the North Market Part II Transfered 4 If the transfered Have a promplete questions and EIN of the North Market Part II Transfered Have a promplete questions and EIN of the North Market Part II Transfered Have a promplete questions and EIN of the North Market Part II Transfered Have a promplete questions and EIN of the North Market Part II Transfered Have a promplete questions and EIN of the North Market Part II Transfered Have a promplete questions and EIN of the North Market Part II Transfered Have a promplete questions and EIN of the North Market Part II and EIN of the North Ma	s under section 367(a)(4) been made? partner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of part of its entire interest in the partnership? of an interest in a limited partnership that is reserved.	sferor (but is not treated as such under EIN of pa 04-35: enership assets? gularly traded on an established see instructions)	er section 367), ertnership 14360	Yes X No Yes X No Yes X No
d Have basis adjustments 3 If the transferor was a promplete questions 3 at a List the name and EIN of the partner pick up to b Did the partner disposing d Is the partner disposing securities market?	s under section 367(a)(4) been made? partner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of part of its entire interest in the partnership? of an interest in a limited partnership that is reserved. Foreign Corporation Information (eign corporation)	sferor (but is not treated as such under EIN of pa 04-35: enership assets? gularly traded on an established see instructions)	er section 367), artnership 14360	Yes X No Yes X No Yes X No
d Have basis adjustments If the transferor was a promplete questions 3 are a List the name and EIN of the partner pick up to be	s under section 367(a)(4) been made? partner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of part of its entire interest in the partnership? of an interest in a limited partnership that is refered. Foreign Corporation Information (eign corporation) A Inc 04/15/2030	sferor (but is not treated as such under EIN of pa 04-35: Inership assets? gularly traded on an established see instructions) 5a	er section 367), ertnership 14360 Identifying number,	Yes X No Yes X No Yes X No if any
d Have basis adjustments If the transferor was a promplete questions 3 at a List the name and EIN of the partner pick up to b Did the partner disposing d Is the partner disposing securities market? Part II Transferee Name of transferee (for ZAIS 2017-22) Address (including course)	s under section 367(a)(4) been made? partner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of part of its entire interest in the partnership? of an interest in a limited partnership that is refered. Foreign Corporation Information (eign corporation) A Inc 04/15/2030	sferor (but is not treated as such under EIN of pa 04-35: cnership assets? gularly traded on an established see instructions) 5a 5b	er section 367), artnership 14360 Identifying number, Reference ID number	Yes X No Yes X No Yes X No if any
d Have basis adjustments If the transferor was a promplete questions 3 at a List the name and EIN of the partner pick up to b Did the partner disposing d Is the partner disposing securities market? Part II Transferee Name of transferee (for ZAIS 2017-2) Address (including cour PO Box 1093	bartner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of part of its entire interest in the partnership? of an interest in a limited partnership that is reference Foreign Corporation Information (eign corporation) A Inc 04/15/2030 httry)	sferor (but is not treated as such under EIN of pa 04-35: mership assets? gularly traded on an established see instructions) 5a 5b (see	er section 367), ertnership 14360 Identifying number,	Yes X No Yes X No Yes X No if any
d Have basis adjustments If the transferor was a promplete questions 3 at a List the name and EIN of the partner pick up to be	s under section 367(a)(4) been made? partner in a partnership that was the actual transferough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of part of its entire interest in the partnership? of an interest in a limited partnership that is reference for partnership that is reference for portation in the partnership that is reference for partnership. CJ KY1-1102 Cayman Island	EIN of pa 04-35: cnership assets? gularly traded on an established see instructions) 5a 5b (see	er section 367), artnership 14360 Identifying number, Reference ID number	Yes X No Yes X No Yes X No if any
d Have basis adjustments If the transferor was a promplete questions 3 are a List the name and EIN of the partner pick up to be Did the partner disposing descurities market? Part II Transferee 4 Name of transferee (for ZAIS 2017-22) 6 Address (including cour PO Box 1093 Grand Cayman 7 Country code of country	bartner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of part of its entire interest in the partnership? of an interest in a limited partnership that is reference Foreign Corporation Information (eign corporation) A Inc 04/15/2030 httry)	EIN of pa 04-35: cnership assets? gularly traded on an established see instructions) 5a 5b (see	er section 367), artnership 14360 Identifying number, Reference ID number	Yes X No Yes X No Yes X No if any
d Have basis adjustments If the transferor was a promplete questions 3 are a List the name and EIN of the partner and EIN of the partner pick up to be Did the partner disposing down a securities market? Part II Transfered 4 Name of transfered (for ZAIS 2017 – 2) Address (including cour po Box 1093 Grand Cayman Country code of country CJ	s under section 367(a)(4) been made? partner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of part of its entire interest in the partnership? of an interest in a limited partnership that is reserved. Foreign Corporation Information (eign corporation) A Inc 04/15/2030 http: CJ KY1-1102 Cayman Island of of incorporation or organization (see instruction)	EIN of pa 04-35: cnership assets? gularly traded on an established see instructions) 5a 5b (see	er section 367), artnership 14360 Identifying number, Reference ID number	Yes X No Yes X No Yes X No if any
d Have basis adjustments If the transferor was a promplete questions 3 are a List the name and EIN of the partner and EIN of the partner pick up complete partner disposing downward and the partner disposing securities market? Part II Transfered A Name of transfered (for ZAIS 2017-2) Address (including cour po Box 1093 Grand Cayman Country code of country CJ Foreign law characterizes	s under section 367(a)(4) been made? partner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of part of its entire interest in the partnership? of an interest in a limited partnership that is reserved. Foreign Corporation Information (eign corporation) A Inc 04/15/2030 http: CJ KY1-1102 Cayman Island of of incorporation or organization (see instruction)	EIN of pa 04-35: cnership assets? gularly traded on an established see instructions) 5a 5b (see	er section 367), artnership 14360 Identifying number, Reference ID number	Yes X No Yes X No Yes X No if any
d Have basis adjustments If the transferor was a promplete questions 3 are a List the name and EIN of the partner and EIN of the partner pick up to be Did the partner disposing down a list the partner disposing securities market? Part II Transferee Name of transferee (for ZAIS 2017-22) Address (including cour po Box 1093 Grand Cayman) CUJ Foreign law characteriz Corporation	s under section 367(a)(4) been made? partner in a partnership that was the actual transtrough 3d. of the transferor's partnership. ame of partnership tunities, L.P. its pro rata share of gain on the transfer of part of its entire interest in the partnership? of an interest in a limited partnership that is reserved. Foreign Corporation Information (eign corporation) A Inc 04/15/2030 http: CJ KY1-1102 Cayman Island of of incorporation or organization (see instruction)	EIN of pa 04-35: Inership assets? gularly traded on an established see instructions) 5a 5b (see	r section 367), artnership 14360 Identifying number, Reference ID number e instructions)	Yes X No Yes X No Yes X No if any

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Page	_

	ation Regarding	g Transfer of Property (see	instructi	ons)		
Section A—Cash	(a)	(b)		(c)	(d)	(e)
Type of property	Date of	Description of		(c) Fair market value on	Cost or other	Gain recognized on
	transfer 05/11/18	property		date of transfer	basis	transfer
Cash	03/11/14			95		
10 Was cash the only If "Yes," skip the re	/ property transferred emainder of Part III a					X Yes No
Section B—Other Pr	operty (other tha	n intangible property subject	to section	on 367(d))		
Type of	(a) Date of	(b) Description of		(c)	(d)	(e)
property	transfer	property		Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Stock and						
securities						
Inventory						
0.11						
Other property						
(not listed under						
another category)						
Property with						
built-in loss						
Totals						
foreign corporation If "Yes," go to line b Was the transfero (including a branc) If "Yes," continue of transferee foreign If "Yes," continue of the transferor d Enter the transferor	n? 12b. r a domestic corporath that is a foreign disto line 12c. If "No," skithe transfer, was the corporation? to line 12d. If "No," skited loss amount inclu	tion that transferred substantially a regarded entity) to a specified 10% tip lines 12c and 12d, and go to lindomestic corporation a U.S. share tip line 12d, and go to line 13. ded in gross income as required useribed in section 367(d)(4)?	ill of the as 6-owned fo e 13. cholder wit	sets of a foreign bra preign corporation? h respect to the	nch	Yes No Yes No Yes No Yes No
Section C—Intangib	le 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 transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
						,
Donor and a donorable and						
Property described						
in sec. 367(d)(4)						
Totals				+		
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	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.		
47	(a) Before % (b) After %		
17	Type of nonrecognition transaction (see instructions)		
18	Indicate whether any transfer reported in Part III is subject to any of the following.	□ v.	V N
a	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

Form **926**(Rev. November 2018)
Department of the Treasury

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. 1

	or the year of the transfer or distribution. Sequence No. 128
Part I U.S. Transferor Information (see instructions)	
Name of transferor Henry County Community Foundation,	Identifying number (see instructions)
Inc.	31-1170412
Is the transferee a specified 10%-owned foreign corporation that is not	
2 If the transferor was a corporation, complete questions 2a through 2d.	a controlled to organication.
a If the transfer was a section 361(a) or (b) transfer, was the transfer or of	ontrolled (under section 368(c)) by
. 5.10	······
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 consolidat	
corporation?	Yes No
If not, list the name and employer identification number (EIN) of the pa	rent corporation.
Name of parent corporation	EIN of parent corporation
·	·
d Have basis adjustments under section 367(a)(4) been made?	Yes No
Trave basis adjustments under section 507(a)(4) been made:	fes No
3 If the transferor was a partner in a partnership that was the actual tran	sferor (but is not treated as such under section 367),
complete questions 3a through 3d.	
List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
Adamag Opportuniting I B	04-3514360
Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part	
	· · · · · · · · · · · · · · · · · · ·
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 re	
	, , <u> </u>
securities market? Part II Transferee Foreign Corporation Information (
4 Name of transferee (foreign corporation) ZAIS 2018-11A Sub 01/20/2032	5a Identifying number, if any
	Eh Deference ID number
6 Address (including country)	5b Reference ID number
PO Box 1093	(see instructions)
Grand Cayman CJ KY1-1102 Cayman Island	
7 Country code of country of incorporation or organization (see instruction	ns)
CJ	
8 Foreign law characterization (see instructions)	
Corporation9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No

Form 926 (Rev. 11-2018) Henry County Community Foundation, 31-1170412

Page ∠

Type of pale of transfer Description of property Date of transfer Description of property Date of transfer Description of property Date of transfer Description of date of transfer Date o		ation Rega	rding Transfer of Property (see	instructio	ons)			
properly transfer property property transferred? (ash 11.76 / 18 11.6 11.	Section A—Cash							
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 property transfer poperty transfer property date of transfer basis. Stock and securities	• • • • • • • • • • • • • • • • • • • •	Date of		!		Cost or other	Gain recognize	ed on
Section B—Other Property (other than intangible property subject to section 367(d)) Type of Dalte of property transfer securities and property subject to section 367(d)) Slock and securities subject to section 367(a) with respect to which a gain recognition agreement was filed? 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? 12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign operation? If "Yes," go to line 12b. Did was the transfer or 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," go to line 12b. If "Yes," continue to line 12b. If "No," skip lines 12b and go to line 13. If Immediately after the transfer, was the domestic corporation of 15° with the transferred loss amount included in gross income as required under section 91 \$\subseteq \text{ Yes} \text{ No} \text{ If "No," skip lines 12b, and go to line 13.} If Pres," continue to line 12b. If "No," skip lines 12b, and go to line 13. If Enter the transferred loss amount included in gross income as required under section 91 \$\subset \text{ Yes} \text{ No} \text{ If No," skip lines 12b, and go to line 13.} If Yes \text{ No \text{ If No," skip lines 12b, and go to line 13.} If the transferred loss amount included in gross income as re	Cash	11/16/1	-8		116			
Type of property Date of property Date of property Date of property Date of property Date of property Date of property Date of property Date of transfer Date of tra	If "Yes," skip the re	emainder of Pa	rt III and go to Part IV.				X Yes	No
Slock and securities Date of property transfer value on property Date of Description of property Date of Description Da	•			to section		(4)	(0)	
Inventory Country Cou	• • • • • • • • • • • • • • • • • • • •	Date of	Description of	1	Fair market value on	Cost or other	Gain recognize	ed 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? 12a 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 adomestic 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 lines 12c and 12d, and go to line 13. I Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferere foreign corporation? If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13. I Enter the transferred or amount included in gross income as required under section 91 \$\rightarrow\$\$ 13 Did the transferor property described in section 367(d)(4)? Type of Date of property Subject to Section 367(d) (a) Date of Property Subject to Section 367(d) (b) Useful Arm's length price Cost or other basis for year of transfer (see instructions) Property described in sec. 367(d)(4)								
Other property (not isted 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? 12a 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 Yes No If 'Yes,' go to line 12b. 14 Was the transferr or 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? 15 Yes,' go to line 12b. If 'No,' skip lines 12c and 12d, and go to line 13. 15 International to line 12b. If 'No,' skip line 12d, and go to line 13. 16 Enter the transferred to as amount included in gross income as required under section 91 S 17 Yes,' continue to line 12b. If 'No,' skip line 12d, and go to line 13. 16 Enter the transferred property described in section 367(d)(4)? 17 Yes of Date of Description of Description of Useful Arm's length price Cost or other Income inclusion for year of transfer property described in sec. 367(d)(4)? 18 Property described in sec. 367(d)(4)								
Property with bubli-in loss	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? 12a 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 transferor transfer property described in section 367(d)(4)? If "No," skip Section C and questions 14a through 15. Section C—Intangible Property Subject to Section 367(d) (a) Description of property Description of property Property described in sec. 367(d)(4) Property described in sec. 367(d)(4)	(not listed under							
Totals 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? 12a 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 transferor transfer property described in section 367(d)(4)? If "No," skip Section C and questions 14a through 15. Section C—Intangible Property Subject to Section 367(d) (a) Description of property Description of property Property described in sec. 367(d)(4) Property described in sec. 367(d)(4)								
11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? 12a 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 ►S 13 Did the transferor transfer property described in section 367(d)(4)? If "No," skip Section C and questions 14a through 15. Section C—Intangible Property Subject to Section 367(d) (a) (b) (c) Useful Arm's length price on date of transfer basis for year of transfer (see instructions) Property described in sec. 367(d)(4)	' '							
11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? 12a 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 3 Did the transferor transfer property described in section 367(d)(4)? Type of property Subject to Section 367(d) (a) Date of Description of property life on date of transfer Cost or other basis of reyear of transfer (see instructions) Property described in sec. 367(d)(4)	Duilt-in ioss							
recognition agreement was filed? Yes	Totals							
Type of property Column C	12a Were any assets of foreign corporation If "Yes," go to line of the Was the transferor (including a branch If "Yes," continue to the transferee foreign of If "Yes," continue to the transferree foreign of the Enter the transferree to the t	f a foreign braing? 12b. a domestic contract is a foreign line 12c. If "National Properties," and the transfer, was corporation? In the transfer in the trans	orporation that transferred substantially all gn disregarded entity) to a specified 10%-No," skip lines 12c and 12d, and go to line as the domestic corporation a U.S. shareh No," skip line 12d, and go to line 13. t included in gross income as required un ty described in section 367(d)(4)?	of the as- owned for 13. nolder with	ed entity) transferred sets of a foreign brackering corporation? The respect to the set of the set	to a	Yes	No No No No No
Type of property Column C	Section C—Intangibl	e Property S	Subject 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 year of train	nsfer
Totals	in sec. 367(d)(4)							
	Totals							

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Recapture under section 1503(d)

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

19

(Rev. November 2018) Department of the Treasury

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

Internal Revenue Service	► Attach to your income tax return	for the year of the transfer or distr	ribution.	Sequence	No. 128
Part I U.S. Trai	nsferor Information (see instructions)				
Name of transferor Henry County	Community Foundation,		Identifying number		uctions)
Inc.			31-11704	<u>L2</u>	
	pecified 10%-owned foreign corporation that is no	• •		Yes	No
	a corporation, complete questions 2a through 2d				
	section 361(a) or (b) transfer, was the transferor			□ vaa	□ Na
five or fewer domesti	in in aviatance often the transfer?			Yes Yes	No No
	ing shareholder(s) and their identifying number(s			les	NO
		7).			
	Controlling shareholder	Identify	ring number		
	a member of an affiliated group filing a consolida				
•				Yes	No
If not, list the name a	and employer identification number (EIN) of the p	arent corporation.			
Na	ame of parent corporation	EIN of par	ent corporation		
d Have basis adjustme	ents under section 367(a)(4) been made?			Yes	No
3 If the transferor was complete questions 3	a partner in a partnership that was the actual trai				
	Name of partnership	EIN Of	partnership		
_					
	rtunities, L.P.		514360		
	up its pro rata share of gain on the transfer of par	rtnership assets?		Yes	X No
	ing of its entire interest in the partnership?			Yes	X No
securities market?	ing of an interest in a limited partnership that is re	egularly traded on an established		Yes	X No
	ee Foreign Corporation Information	(see instructions)		res	A NO
4 Name of transferee (-		a Identifying num	her if any	
ZAIS Clo 1		۱	a lacitarying nam	bor, ir arry	
6 Address (including co		5	b Reference ID nu	mber	
PO Box 1093		(1)	see instructions)		
Grand Cayman	CJ KY1-1102 Cayman Islan	ds	· 		
CJ	ntry of incorporation or organization (see instruct	ions)			
Corporatio					
9 Is the transferee fore	ign corporation a controlled foreign corporation?			Yes	X No

Form 926 (Rev. 11-2018) Henry County Community Foundation, 31-1170412

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Page	_

Part III Inform	ation Regar	ding Transfer of Property (see	instruction	ons)		
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	11/16/1			45		
	emainder of Par	erred? t III and go to Part IV. than intangible property subject				X Yes No
Type of property	(a) Date of	(b) Description of		(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
	transfer	property		date of transfer	basis	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 b Was the transferor (including a branch If "Yes," continue to transferee foreign If "Yes," continue to d Enter the transferor 13 Did the transferor	of a foreign branch? 12b. The adomestic corn that is a foreign to line 12c. If "Note the transfer, was corporation? To line 12d. If "Note the loss amount transfer property	ch (including a branch that is a foreign of the control of the con	disregarde	ed entity) transferred sets of a foreign bra preign corporation? h respect to the	to a	Yes No Yes No Yes No Yes No Yes No
Section C—Intangib		ubject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Recapture under section 1503(d)

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

19

(Rev. November 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

Sequence No. 128

Attachment

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
Henry County Community Foundation,	
Inc.	31-1170412
1 Is the transferee a specified 10%-owned foreign corporation that is no	a controlled foreign corporation? Yes No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor of	_ · ·
1 5:10 (6) : : : (6 0) (6 0	Yes No
b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identifying number(s)	Yes No
in not, list the controlling shareholder(s) and their identifying humber(s)	•
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidat corporation?	·
If not, list the name and employer identification number (EIN) of the pa	rent corporation.
	•
Name of parent corporation	EIN of parent corporation
Name of parent corporation	EIN of parent corporation
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(4) been made?	Yes No
d Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual transferor.	Yes No
d Have basis adjustments under section 367(a)(4) been made?	Yes No
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. 	Yes No Seferor (but is not treated as such under section 367),
 d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. 	Yes No
d Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership	Yes No Seferor (but is not treated as such under section 367), EIN of partnership
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P.	Yes No Seferor (but is not treated as such under section 367), EIN of partnership 04-3514360
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of partnership.	Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 nership assets? Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part c Is the partner disposing of its entire interest in the partnership?	Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 nership assets? Yes X No Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 re	EIN of partnership 04-3514360 nership assets? Yes No Yes No Yes X No Yes X No Gularly traded on an established
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part c Is the partner disposing of its entire interest in the partnership?	Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 nership assets? Yes X No Yes X No gularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market?	Yes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 nership assets? Yes X No Yes X No gularly traded on an established Yes X No
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (Tyes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual tran complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of part 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 resecurities market? Part II Transferee Foreign Corporation Information (EIN of partnership 04-3514360 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of partice 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 resecurities market? Part II Transferee Foreign Corporation Information (Name of transferee (foreign corporation) ZAIS8 2018-1A Sub 04/15/2029	Tyes No sferor (but is not treated as such under section 367), EIN of partnership 04-3514360 nership assets? Yes X No yes X No gularly traded on an established yes X No see instructions) 5a Identifying number, if any
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of particular 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) ZAIS8 2018-1A Sub 04/15/2029 6 Address (including country) PO Box 1093 Grand Cayman CJ KY1-1102 Cayman Island	EIN of partnership 04-3514360 nership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its promata share of gain on the transfer of particular content of the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) ZAIS8 2018-1A Sub 04/15/2029 6 Address (including country) PO Box 1093 Grand Cayman CJ KY1-1102 Cayman Island 7 Country code of country of incorporation or organization (see instruction)	EIN of partnership 04-3514360 nership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its promata share of gain on the transfer of particular lists the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) ZAIS8 2018-1A Sub 04/15/2029 6 Address (including country) Po Box 1093 Grand Cayman CJ KY1-1102 Cayman Island 7 Country code of country of incorporation or organization (see instruction CJ	EIN of partnership 04-3514360 nership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its pro rata share of gain on the transfer of particular 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 resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) ZAIS8 2018-1A Sub 04/15/2029 6 Address (including country) PO Box 1093 Grand Cayman	EIN of partnership 04-3514360 nership assets? Yes X No Yes X No gularly traded on an established Yes X No See instructions) 5b Reference ID number (see instructions)
d Have basis adjustments under section 367(a)(4) been made? 3 If the transferor was a partner in a partnership that was the actual transcomplete questions 3a through 3d. a List the name and EIN of the transferor's partnership. Name of partnership Adamas Opportunities, L.P. b Did the partner pick up its promata share of gain on the transfer of particular lists the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is resecurities market? Part II Transferee Foreign Corporation Information (4 Name of transferee (foreign corporation) ZAIS8 2018-1A Sub 04/15/2029 6 Address (including country) Po Box 1093 Grand Cayman CJ KY1-1102 Cayman Island 7 Country code of country of incorporation or organization (see instruction CJ	EIN of partnership 04-3514360 nership assets? Yes X No Yes X No gularly traded on an established Yes X No see instructions) 5a Identifying number, if any 5b Reference ID number (see instructions)

Form 926 (Rev. 11-2018) Henry County Community Foundation, 31-1170412

Page	2
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Part III Informa	ation Rega	rding Transfer of Property (see i	instruction	ons)			
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 recogni transfe	
Cash	02/23/1	.8		33			
	emainder of Pa	rt III and go to Part IV.				_ X Yes [No No
	operty (otne	r than intangible property subject t	o sectio	(c)	(d)	(e)	
Type of property	Date of transfer	Description of property	- 1	Fair market value on date of transfer	Cost or other basis	Gain recogni transfe	
Stock and							
securities		_					
Inventory							
Other property (not listed under another category)							
Property with							
built-in loss							
Totals							
foreign corporation If "Yes," go to line b Was the transferor (including a branch If "Yes," continue to c Immediately after t transferee foreign of If "Yes," continue to d Enter the transferor 13 Did the transferor	f a foreign braing? 12b. a domestic conthat is a foreign line 12c. If "Net transfer, was corporation? o line 12d. If "Net loss amountransfer proper	proporation that transferred substantially all gn disregarded entity) to a specified 10%-lo," skip lines 12c and 12d, and go to line as the domestic corporation a U.S. shareh loo," skip line 12d, and go to line 13. It included in gross income as required uncty described in section 367(d)(4)?	of the as owned fo 13. colder wit	ed entity) transferred sets of a foreign bra breign corporation? h respect to the	to a	Yes Yes Yes Yes Yes	No No No No No
Section C—Intangibl	e Property S	Subject to Section 367(d)					
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income incl for year of tr (see instru	ansfer
Property described in sec. 367(d)(4)							
Totals							

Form 9	26 (Rev. 11-2018) Henry County Community Foundation, 31-1170412		Page 3
14a	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
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferer's interest in the transferes fereign corneration before and after the transfer		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
47	(a) Before % (b) After % Type of nonrecognition transaction (see instructions) ▶		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	0 : "	Yes	Y No
a	Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F)	Yes	X No
b	Gain recognition under section 904(1)(5)(F)	L	V NO

Recapture under section 1503(d)

Exchange gain under section 987

Did this transfer result from a change in entity classification?

property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions Form **926** (Rev. 11-2018)

Yes

Yes

Yes

Yes

X

X

No

No

No

No

X No

С

d

b

21

If "Yes," complete lines 20b and 20c.

19

		Ī			_			OMB No. 1545-004	7
Forr	Exempt Organization Business Income Tax Return (and proxy tax under section 6033(e))							2019	
		For cal		ax year beginning s.gov/Form990T for instru				2019	
	artment of the Treasury nal Revenue Service	▶ Do n	Go to www.ii	s.gov/Form990T for instrus on this form as it may be	uctions and	d the latest informa	tion.	Open to Public Inspect	on for
A	Check box if	P DO II	Name of organization					tification number	SOIN
	address changed Exempt under section			nty Communit	•	,		st, see instructions.)	
[X 501(C)(3)	Print	Inc.						
[408(e) 220(e)	or		or suite no. If a P.O. box, see instr	ructions.		31-11	70412	
ļ	408A 530(a)	Туре	PO Box 60					iness activity code	
	529(a)		, ,	vince, country, and ZIP or foreign			(See instruction	,	
	Book value of all assets		New Castl			7362-6006	52599	0	
	at end of year			ber (See instructions.)			404(-) +	O41 44	
				pe ► X 501(c) corporates or businesses. ►		501(c) trust	401(a) trust		
	Partnersh:	-			<u> </u>	escribe the only (or	•	de or business here If only one, comple	
				blank space at the end of	of the prev	ious sentence co			.0
				nen complete Parts III–V	•	iodo deriterios, coi	inplote i dite i dila	ii, complete a	
				y in an affiliated group o		-subsidiary control	led group?	. • Yes	No
	If "Yes," enter the name	e and id	entifying number of t	he parent corporation.	·	•			1
	<u> </u>		<u> </u>						
000000000000000000000000000000000000000	The books are in care of						1	765-529-2	<u>235</u>
-			de or Business I	ncome		(A) Income	(B) Expenses	(C) Net	
1a	Gross receipts or sale			 c Balance ▶	10				
b 2	Less returns and allo								<u> </u>
3	Gross profit. Subtract		It A						
4a									
b	Net gain (loss) (Form 479	97, Part I	I, line 17) (attach Form 4	1797)	4b				
С	Capital loss deduction		oto		4c				
5	Income (loss) from pa	artnersh	ip and S corporation		5	-30,347	,	-30,	347
6	Rent income (Schedu				6				
7	Unrelated debt-finance	ced inco	me (Schedule E)		7				
8	Interest, annuities, royalt	ies, and r	rents from controlled org	anization (Schedule F)	8				
9	Investment income of a s	section 50	01(c)(7), (9), or (17) orga	inization (Schedule G)					
10	Exploited exempt acti	ivity inco	ome (Schedule I)		10				
11	Advertising income (S								
12						-30,347	,	-30,	247
13 D	Total. Combine lines art II Deduction	3 through	gn iz ht Takon Elsowh	ere (See instruction					
	connecte	d with	the unrelated bu	isiness income.)	15 101 1111	illations on dec	additions.) (Ded	uctions must be	, un echy
14				(Schedule K)				14	
15	Salaries and wages							15	
16	Repairs and maintena	ance						16	
17	Bad debts							17	
18	Interest (attach sched							18	
19	Taxes and licenses							19	
20 21	Less depreciation de	imed or	ο Schedule Δ and als	ewhere on return		20	2	1b	0
22	Danielian							22	
23		rred con	npensation plans					23	
24	Employee benefit pro	grams						24	
25			chedule I)					25	
26	Excess readership co	sts (Scl	hedule J)					26	<u> </u>
27	Other deductions (att	ach sch	edule)					27	
28	Total deductions. A	dd lines	14 through 27					28	
29				erating loss deduction. S				29 -30,	347
30		erating lo	oss arising in tax yea	rs beginning on or after	January 1	, 2018 (see			
								30	247
31	Unrelated business ta	axable ii	ncome. Subtract line	30 from line 29		<u></u>		31 -30,	3 4 /

**********	1990-T (2019) Henry County Community Foundation, 31-1170412	2		Page 2
Pa	art III Total Unrelated Business Taxable income			
32	Total of unrelated business taxable income computed from all unrelated trades or businesses (see			
	instructions)		32	
33	Amounts paid for disallowed fringes		33	
34	Charitable contributions (see instructions for limitation rules)		34	
35	Total unrelated business taxable income before pre-2018 NOLs and specific deductions. Subtract line			
	34 from the sum of lines 32 and 33		35	
36	Deductions for net operating loss arising in tax years beginning before January 1, 2018 (see			
	instructions)		36	
37	Total of unrelated business taxable income before specific deduction. Subtract line 36 from line 35		37	0
38	Specific deduction (Generally \$1,000, but see line 38 instructions for exceptions)		38	1,000
39	Unrelated business taxable income. Subtract line 38 from line 37. If line 38 is greater than line 37,			-
	enter the smaller of zero or line 37		39	0
Pa	art IV Tax Computation			
40	Organizations Taxable as Corporations. Multiply line 39 by 21% (0.21)	•	40	
41	Trusts Taxable at Trust Rates. See instructions for tax computation. Income tax on			
	the amount on line 39 from: Tax rate schedule or Schedule D (Form 1041)	▶	41	
42	Proxy tax. See instructions	🕨	42	
43	Alternative minimum tax (trusts only)		43	
44	Tax on Noncompliant Facility Income. See instructions		44	
45	Total. Add lines 42, 43, and 44 to line 40 or 41, whichever applies		45	0
Pa	art V Tax and Payments			
46a	Foreign tax credit (corporations attach Form 1118; trusts attach Form 1116) 46a			
b	Other credits (see instructions) 46b			
С	General business credit. Attach Form 3800 (see instructions) 46c			
d	Credit for prior year minimum tax (attach Form 8801 or 8827) 46d			
е	Total credits. Add lines 46a through 46d		46e	
47	Subtract line 46e from line 45		47	
48	Other taxes. Check if from: Form 4255 Form 8611 Form 8697 Form 8866 Other (att. sch.)		48	
49	Total tax. Add lines 47 and 48 (see instructions)		49	0
50	2019 net 965 tax liability paid from Form 965-A or Form 965-B, Part II, column (k) line 3		50	<u> </u>
51a	Payments: A 2018 overpayment credited to 2019 [51a]			
b	2019 estimated tax payments 51b		-	
C	Toy deposited with Form 9969			
d	Foreign organizations: Tax paid or withheld at source (see instructions) 51d			
e	Backup withholding (see instructions) 51e		_	
f	Credit for small employer health insurance premiums (attach Form 8941) 516 517		_	
g g			-	
9	Other credits, adjustments, and payments: Form 2439 Total > 51g			
52	Total payments Add lines 54s through 54s		52	
53	Fating and the company to the control of the contro	•	53	
54	Tax due. If line 52 is less than the total of lines 49, 50, and 53, enter amount owed	—	54	0
55	Overpayment. If line 52 is larger than the total of lines 49, 50, and 53, enter amount overpaid	[55	
56	Enter the amount of line 55 you want: Credited to 2020 estimated tax Refund Refund	lod •	56	
	art VI Statements Regarding Certain Activities and Other Information (see instru		30	
57				Yes No
51	At any time during the 2019 calendar year, did the organization have an interest in or a signature or other a over a financial account (bank, securities, or other) in a foreign country? If "YES," the organization may have	e to file	<i>'</i> >	163 140
	FinCEN Form 114, Report of Foreign Bank and Financial Accounts. If "YES," enter the name of the foreign	country	y	
	here ▶			X
58	During the tax year, did the organization receive a distribution from, or was it the grantor of, or transferor to	, a fore	gn trust	t? X
59	If "YES," see instructions for other forms the organization may have to file. Enter the amount of tax-exempt interest received or accrued during the tax year ▶			
	Under penalties of periury. I declare that I have examined this return, including accompanying schedules and statements, and to the best of my k	nowledge a	and belief,	it is a specific state of
Sig	true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.			with the preparer shown below
He	re Executive Director			(see instructions)?
	Signature of officer Date Title			X Yes No
	Print/Type preparer's name Preparer's signature Date	е	Check	if PTIN
Paid		/22/24	self-emp	
Pre	parer Firm's name Estep Burkey Simmons, LLC	Firm's	S EIN 🕨	04-3587095
Use	Only PO Box 42			
	Firm's address Muncie, IN 47308-0042	Phone	e no.	765-284-7554
				- 000 T

Description of debt-financed property		Gross income from or allocable to debt-financed	Deductions directly connected with or allocable to debt-financed property			
	i. Description of dept	-illianced property	property	(a) Straight line depreciation (attach schedule)	(b) Other deductions (attach schedule)	
(1)	N/A					
(2)						
(3)						
(4)						
	 Amount of average acquisition debt on or allocable to debt-financed property (attach schedule) 	Average adjusted basis of or allocable to debt-financed property (attach schedule)	6. Column 4 divided by column 5	7. Gross income reportable (column 2 x column 6)	8. Allocable deductions (column 6 x total of columns 3(a) and 3(b))	
(1)			%			
(2)			%			
(3)			%			
(4)			%			
				Enter here and on page 1, Part I, line 7, column (A).	Enter here and on page 1, Part I, line 7, column (B).	

Form **990-T** (2019)

Total dividends-received deductions included in column 8.

Form 990-T (2019)	Henry	County	Community	Foundation,	31-1170412
Sabadula E In	toroot Ar	nuition Do	valtice and De	nto From Control	lad Organizations

Schedule F – Interest, Ani	iuities, Roya	aities, and F		pt Controlle				ons (see in	ISTRUCTIO	ons)
Name of controlled organization	ider	2. Employer ntification number	3. Net unrelated income (loss) (see instructions)		Total of specified payments made		ade	Part of column 4 that is included in the controlling organization's gross income.		6. Deductions directly connected with income in column 5
(1) N/A										
(2)										
(3)										
(4)										
Nonexempt Controlled Organiz	zations		ı						1	
7. Taxable Income		Net unrelated incomess) (see instructions	'		included in the		e controlling con		11. Deductions directly connected with income in column 10	
(1)										
(2)										
(3) (4)										
(4)										
Totals					•	Ente Par	t I, line 8,	l on page 1, column (A).	Ente Par	ld columns 6 and 11. er here and on page 1, t I, line 8, column (B).
Schedule G – Investment	Income of a	Section 501	1(c)(7).	(9). or (17) Ora	anizat	tion (se	ee instruction	ons)	
1. Description of income		2. Amount of		3. De	ductions connecte schedule	d	4	. Set-asides ach schedule)		5. Total deductions and set-asides (col. 3 plus col.4)
(1) N/A										
(1) N / A (2)										
(3)										
(4)										
Totals	•	Enter here and o Part I, line 9, co	on page 1, olumn (A).						En Pa	ter here and on page 1, art I, line 9, column (B).
Schedule I – Exploited Ex	empt Activit	v Income. C	Other T	han Adver	tisino	ı Inco	me (se	e instructio	ns)	
						<u>,</u>			,	
1. Description of exploited activity	2. Gross unrelated business incom from trade or business	a. Exper direct connecter productic unrelate business in	tly d with on of ted	4. Net income (from unrelated or business (co 2 minus column If a gain, compacols. 5 through	trade lumn n 3). oute	from a	ss income ctivity that unrelated ss income	attribu	penses table to mn 5	7. Excess exempt expenses (column 6 minus column 5, but not more than column 4).
(1) N/A										
(2)										
(3)										
(4)										
Totals	Enter here and c page 1, Part I, line 10, col. (A)	page 1, F	Part I,							Enter here and on page 1, Part II, line 25.
Schedule J - Advertising	Income (see	instructions)								
Part I Income From	Periodicals	Reported or	า a Cor	nsolidated	Basi	S				
1. Name of periodical	2. Gross advertising income	3. Dire advertisinç		4. Advertisir gain or (loss) (2 minus col. 3 a gain, compi cols. 5 through	(col.). If ute		culation come		dership sts	7. Excess readership costs (column 6 minus column 5, but not more than column 4).
(1) N/A										
(2)										
(3)						-				
(4)										
Totals (carry to Part II, line (5)) .										

Form 990-T (2019) Henry County Community Foundation, 31-1170412 Page 5
Part II Income From Periodicals Reported on a Separate Basis (For each periodical listed in Part II, fill in columns 2 through 7 on a line-by-line basis.)

Z tillough 7 on	a ilile-by-lille ba	1515. <i>)</i>				
1. Name of periodical	2. Gross advertising income	3. Direct advertising costs	4. Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5. Circulation income	6. Readership costs	7. Excess readership costs (column 6 minus column 5, but not more than column 4).
(1) N/A						
(2)						
(3)						
(4)						
Totals from Part I						
	Enter here and on page 1, Part I, line 11, col. (A).	Enter here and on page 1, Part I, line 11, col. (B).				Enter here and on page 1, Part II, line 26.
Totals, Part II (lines 1-5)	, ,	,				
Cahadula K Campanasti	on of Officers	Directors and	Tructose /see i	matrications)		

Schedule K – Compensation of Officers, Directors, and Trustees (see instructions)

1. Name	2. Title	time devoted to business	Compensation attributable to unrelated business
(1) N/A		%	
(2)		%	
(3)		%	
(4)		%	
Total Enter here and on page 1 Part II line 1/		_	_

Form **990-T** (2019)

28615 Henry County Community Foundation,
31-1170412 Federal Statements

FYE: 12/31/2019

Statement 1 - Form 990-T, Part I, Line 5 - Income (Loss) from Partnerships or S-Corps

Name of Partnership or S-Corp	 Gross Income	Direct Deductions (Pa	rt. only)	Net Income
Adamas	\$ -3,935	\$	\$	-3,935
Davidson				
FEG I	24,560			24,560
FEG II	-43,084			-43,084
Sig Guff	-1			-1
Truebridge	-53			-53
Ironsides Direct Investment V	-1,546			-1,546
Ironsides Partnership Fund V	 -6,288			-6,288
Total	\$ -30,347	\$	0 \$	-30,347

4/22/2024 1:08 PM

Form **990**

Two Year Comparison Report

, ending

2018 & 2019

Name
Henry County Community Foundation,

For calendar year 2019, or tax year beginning

Taxpayer Identification Number

	Inc.	-,			31-1	.170412
			2018	2019		Differences
	1. Contributions, gifts, grants	1.	3,782,663	3,007,	406	-775,257
	2. Membership dues and assessments	2.				
	3. Government contributions and grants	3.				
n e	4. Program service revenue	4.	416,403	443,	586	27,183
_	5. Investment income	5.	630,095	734,	233	104,138
>	6. Proceeds from tax exempt bonds	6.				
₽	7. Net gain or (loss) from sale of assets other than inventory	7.	990,132	279,	146	-710,986
	8. Net income or (loss) from fundraising events	8.				
	9. Net income or (loss) from gaming	9.				
	10. Net gain or (loss) on sales of inventory	10.				
	11. Other revenue	11.	-13,402	-16,	997	-3 , 595
	12. Total revenue. Add lines 1 through 11	12.	5,805,891	4,447,		
	13. Grants and similar amounts paid	13.	1,468,516	1,570,	349	101,833
	14. Benefits paid to or for members	14.				
e	15. Compensation of officers, directors, trustees, etc.	15.	74,750		000	8,250
n s	16. Salaries, other compensation, and employee benefits	16.	148,963	143,	577	-5,386
Φ	17. Professional fundraising fees	17.				
κ	18. Other professional fees	18.	675,090	706,		31,312
Ш	19. Occupancy, rent, utilities, and maintenance	19.	37,916	19,		-18,585
	20. Depreciation and Depletion	20.	24,531		577	46
	21. Other expenses	21.	572 , 563			-406,962
	22. Total expenses. Add lines 13 through 21	22.	3,002,329	2,712,		-289,492
	23. Excess or (Deficit). Subtract line 22 from line 12	23.	2,803,562	1,734,		-1,069,025
	24. Total exempt revenue	24.	5,805,891	4,447,		-1,358,517
Ē	25. Total unrelated revenue	25.	-41,210	-12,		29,001
Ę	26. Total excludable revenue	26.	2,064,438	1,452,		-612,261
Ę	27. Total assets	27.	38,753,482	45,442,		6,689,477
٦Ę	28. Total liabilities	28.	1,127,204	955,		-171,797
=	29. Retained earnings	29.	37,626,278		552	6,861,274
Other Information	30. Number of voting members of governing body	30.	15	17		
0	31. Number of independent voting members of governing body	31.	<u> 15</u>	16		
	32. Number of employees	32.	7	7		
	33. Number of volunteers	33.	80	80		

Form **990T**

45. Payment made with extension

51. Penalties

52. Total due/(Refund)

46. Backup withholding and foreign withholding

48. Total payments 49. Balance due/(Overpayment)

47. Other payments

50. Overpayment applied to next year _____

Two Year Comparison Report

2018 & 2019

For calendar year 2019, or tax year beginning Name Taxpayer Identification Number Henry County Community Foundation, 31-1170412 Inc. 2018 2019 **Differences** 1. Gross profit/loss on business activities 1. 2. Capital gains/losses 4,924 -35,271-30,3473. Income/loss from partnerships and S corporations 3. 4. Rent income (net of expense) 4. 5. Unrelated debt-financed income (net of expense) 5. **6.** Income from controlled organizations (net of expense) 6. **7.** Section 501(c)(7)(9)(17) organization income (net of expense) 7. 8. Exploited exempt activity income (net of expense) 8. **9.** Advertising income (net of expense) 9. 10. **10.** Other income -35,271 -30,3474,924 11. Total trade or business income. Combine lines 1 through 10 11. **12.** Compensation of officers, directors, and trustees 12. 13. 13. Other salaries and wages 14. Repairs and maintenance 14. 15. Bad debts 15. 16. Interest 16. **17.** Taxes and licenses 17. **18.** Charitable contributions 18. 19. Depreciation and Depletion 19. 20. **20.** Contributions to deferred compensation plans 21. **21.** Employee benefit programs 22. Other deductions 22. 23. Total deductions. Add lines 12 through 22 23. -30,3474,924 24. Net income (990T/first activity); Subtract line 23 from 11 24. 25. Number of unrelated business activities for this return 25. 26. Unrelated business taxable income from all trades -35,27135,271 26. 27. Disallowed employee fringe benefits 27. 28. Charitable contributions 28. 29. Taxable income before NOL loss 29. **30.** Net operating loss (pre-2018) **31.** Specific deduction 1,000 1,000 31. 32. Unrelated business taxable income. 33. Income tax (corporate or trust) 33. **34.** Proxy tax 34. 35. **35.** Other taxes 36. Total taxes 36. 37. Other credits 38. General business credit 38. **39.** Credit for prior year minimum tax 40. Total credits 40. 41. Net tax after credits 41. **42.** Recapture taxes and 965 tax 42. 43. Total Taxes 43. **44.** Prior year overpayment and estimated tax payments 44.

45.

46.

47.

49.

50.

51.

Form **SchM**

Two Year Comparison for Unrelated Business Activity

-30,347 35,271

-65,618

2018 & 2019

4,924 35,271

-30,347

Organization Name

For calendar year 2019, or tax year beginning

Taxpayer Identification Number 31-1170412

Henry County Community Foundation,

24. Deductible losses25. Unrelated business taxable income (loss)

Оппостр	orated Business Income Tax Code: 525990 Activity: Unrel		ed Business A	2019	Differences
1	Gross profit/loss on business activities	1.	2010	2010	Dinordinoco
l l	Canital gains/losses	2.			
	Income/loss from partnerships and S corporations	3.	-35,271	-30,347	4,924
□ 4	Rental income (net of expense)	4.	337=-	307331	
	Unrelated debt-financed income (net of expense)	5.			
an I	Interest, and other income from controlled organizations (net of expense)	6.			
	Investment income of specific organizations (net of expense)	7.			
	Exploited exempt activity income (net of expense)	8.			
	Advertising income (net of expense)	9.			
	Other income	10.			
11.	Total trade or business income. Combine lines 1 through 10	11.	-35,271	-30,347	4,924
12.	Compensation of officers, directors, and trustees	12.			
13.	Other salaries and wages	13.			
14.	Repairs and maintenance	14.			
15.	Bad debts	15.			
σ 16.	Interest	16.			
ω _ω 17.	Taxes and licenses	17.			
	Depreciation and Depletion	18.			
<u>a</u> 19.	Contributions to deferred compensation plans	19.			
<u>ж</u> 20.	Employee benefit programs	20.			
21.	Other deductions	21.			
22.	Total deductions. Add lines 12 through 22	22.			
	Taxable income before deductions. Subtract line 23 from 11	23.	-35,271	-30,347	

24.

25.

-35,271

NP-20 State Form 51062 (R10 / 8-19)

Indiana Department of Revenue

Indiana Nonprofit Organization's Annual Report For the Calendar Year or Fiscal Year

Beginning 01 01 2019 and Ending 12 31 2019 MM/DD/YYYY MM/DD/YYYY

Check i	f: Change of Address
	Amended Report
019	☐ Final Report: Indicate
019	Date Closed

it

Due on the 15th day of the 5th month following the end of the tax year. NO FEE REQUIRED.

Name of Organization				Telephone Number
HENRY COUNTY COMMUNI	TY FOUNDATION, INC.			765 529 2235
Address				Indiana Taxpayer Identification Number
PO BOX 6006		33		0004850521 001
City	State	Zip Code		Federal Employer Identification Number
NEW CASTLE	IN	47362	6006	31 1170412
Printed Name of Person to Contact			Contact's Telephone	Number
BEVERLY MATTHEWS			765 529 22	35
	ttach a completed copy of Form 990, related business income of more than			ection 513 of the Internal Revenue Code, yo
Current Information				
3. Attach a schedule, listing the4. Briefly describe the purpose	r organization has been in continuous names, titles and addresses of your or or mission of your organization below ECURES PERMANENT FU	current office. NDS F	cerSEE STA	THROPIC PURPOSES. ITS
THE COMMUNITY AND				
Email Address: BEVERLY@HE	ENRYCOUNTYCF.ORG			and to the best of my knowledge and belief,
			SIDENT AN	
Signature of Officer or Trustee		Title		Date
BEVERLY MATTHEWS		765	529 2235	
Name of Person(s) to Contact		Daytime	e Telephone Num	ber
	Important: Please submit this con Indiana Department of Reve	nue, Tax <i>i</i>		on to:

P.O. Box 6481

Indianapolis, IN 46206-6481 Telephone: (317) 232-0129

Extensions of Time to File

The Department recognizes the Internal Revenue Service application for automatic extension of time to file, Form 8868. Please forward a copy of your federal extension, identified with your Nonprofit Taxpayer Identification Number (TID), to the Indiana Department of Revenue, Tax Administration by the original due date to prevent cancellation of your sales tax exemption. Always indicate your Indiana Taxpayer Identification number on your request for an extension of time to file.

Reports post marked within thirty (30) days after the federal extension due date, as requested on Federal Form 8868, will be considered as timely filed. A copy of the federal extension must also be attached to the Indiana report. In the event that a federal extension is not needed, a taxpaye may request in writing an Indiana extension of time to file from the: Indiana Department of Revenue, Tax Administration, P.O. Box 6481, Indianapolis, IN 46206-6481, (317) 232-0129.

If Form NP-20 or extension is not timely filed, the taxpayer will be notified by the Department pursuant to I.C. 6-2.5-5-21(d), to file Form NP-20. If within sixty (60) days after receiving such notice the taxpayer does not file Form NP-20, the taxpayer's exemption from sales tax will be canceled.

28615 Henry County Community Foundation,
31-1170412 Indiana Statements

FYE: 12/31/2019

Statement 1 - IN Form NP-20, Line 3 - Current Officers

Officer Name	Title		
Address	City	<u>State</u>	Zip Code
Beverly Matthews	Executive Director		
PO Box 6006	New Castle	IN	47362
Marsha Gratner	Chair		
PO Box 6006	New Castle	IN	47362
Mike Broyles	1st Vice Chair		
PO Box 6006	New Castle	IN	47362
Carrie Barrett	2nd Vice Chair		
PO Box 6006	New Castle	IN	47362
Susan Falck-Neal	Treasurer		
PO Box 6006	New Castle	IN	47362

4/22/2024 1:08 PM

Form IT-20NP

Check box if amended.

State Form 148 (R18 / 8-19)

Indiana Department of Revenue Indiana Nonprofit Organization Unrelated Business Income Tax Return Calendar Year Ending December 31, 2019 or

Fiscal Year Beginning

2019

and Ending

Check box if name changed.

Check box if amended. Name of OrganizationHENRY COUNTY COMMUNITY FOUNDATION, INC. Number and Street 2-Digit County Code PO BOX 6006 City State ZIP Code	525990 Telephone Number
NEW CASTLE IN 47362 6006	765 529 2235
,	kruptcy Schedule M
L Do you have on file a valid extension of time to file your return (federal Form 7004 or an electron	ic extension of time)? X Yes No
Adjusted Gross Income Tax Calculation on Unrelated Business Income	
1. Unrelated business taxable income before NOL deduction from federal Form 990-T.	0.0
Use a minus sign for negative amounts. Attach Form 990 <u>-T</u>	
Specific deduction (generally \$1,000; see instructions)	
Subtract line 2 from line 1	3 -1000 .00
Modifications (use a minus sign for negative amounts)	_
4. Enter name of add-back or deduction U.S. OBLIGATIONS Code No. 622	
5. Enter name of add-back or deduction Code No.	5 .00
6. Enter name of add-back or deduction Code No.	6 .00
7. Enter name of add-back or deduction Code No.	7 .00
8. Unrelated business income: add or subtract lines 3 through 7. If not apportioning, enter	
same amount on line 10	8 -1000 .00
9. Enter Indiana apportionment percentage, if applicable, from line 9 of IT-20 Schedule E	
apportionment (enclose schedule)	9 %
10. Unrelated business income apportioned to Indiana (line 8 x line 9; otherwise, enter line 8 amour	
11. Enter Indiana Net Operating Loss deduction. Enclose Schedule IT-20NOL	
12. Taxable Indiana unrelated business income (subtract line 11 from line 10)	
13. Taxable income from other forms (Form 1120-POL)	
14. Subtotal (add lines 12 and 13)	
15. Indiana tax on unrelated business income (multiply line 14 by tax rate; see instructions for line 1	
16. Sales/use tax on purchases subject to use tax from Sales/Use Tax Worksheet	
17. Total tax due (add lines 15 and 16)	17 .00
Credit for Estimated Tax and Other Payments	
18. Quarterly estimated tax paid: Qtr. 1 Qtr. 2 Qtr. 3 Qtr. 4 Ente	er total 18 .00
19. Amount paid with extension	
20. Amount of overpayment credit (from tax year ending)	
21. EDGE credit. Enter the total EDGE credit amount claimed (line 19 on Schedule IN-EDGE)	
22. EDGE-R credit. Enter the total EDGE-R credit amount claimed (line 19 on Schedule IN-EDGE-	,
	23 .00
24. Certified credits. Enter the total of certified credits claimed from Schedule IN-OCC and enclose	0.0
schedule with your return	2.2
·	
26. Balance of tax due (line 17 minus 25)	
27. Penalty for the underpayment of estimated tax. Attach Schedule IT-2220	27 .00
Check box if using annualization method 28. Interest: If payment is made after the original due date, compute interest (see instructions)	28 .00
29. Penalty: If paid late, enter the greater of \$5 or 10% of line 26; see instructions. If line 17 is zero,	
enter \$10 per day filed past due date	0.0
30. Total payment due (add lines 26-29). (Payment must be made in U.S. funds) PAY THIS AMOU	
31. Total overpayment (line 25 minus lines 17 and 27-29)	
32. Amount of line 31 to be refunded	
33. Amount of line 31 to be applied to the following year's estimated tax account	
5. Tanodata Statio of to be applied to the following your 5 continued tax account	

Additional Explanation or Adjustment

Line (a) Explanation (b) Amount (c)

.00

.00

.00

Certification of Signatures and Authorization Section

Under penalties of perjury, I declare I have examined this return, including all accompanying schedules and statements, and to the best of my knowledge and belief it is true, correct, and complete.

I authorize the department to discuss my return with my personal representative (see instructions). X Yes No

Paid Preparer's Email Address: TAROBERTS@EBSCPA.COM

THOMAS A. ROBERTS ESTEP BURKEY SIMMONS, LLC

Personal Representative's Name (Print or Type) Paid Preparer: Firm's Name (or yours if self-employed)

P00997867

Personal Representative's Email Address

PTIN

765 284 7554 Signature of Corporate Officer Date Telephone Number

EXECUTIVE DIRECTOR BEVERLY MATTHEWS PO BOX 42 Print or Type Name of Corporate Officer Title Address

MUNCIE THOMAS A. ROBERTS 04 22 2024 Signature of Paid Preparer Date City

IN THOMAS A. ROBERTS

47308 0042 Zip Code + 4 State Print or Type Name of Paid Preparer

> Please mail your forms to: Indiana Department of Revenue P.O. Box 7228 Indianapolis, IN 46207-7228

SCHEDULE E Form IT-20/20S/20NP/IT-65 State Form 49105 (R18 / 8-19)

Indiana Department of Revenue Apportionment of Income for Indiana

2019 for Tax Year Beginning **01** 01 2019 and Ending **12** 31

Name as shown on return

Federal Employer Identification Number

HENRY COUNTY COMMUNITY FOUNDATION,

31 1170412

Each filing entity having income from sources both within and outside Indiana must complete an apportionment schedule except financial institutions and certain insurance companies that use a single receipts factor. Interstate transportation entities must use Schedule E-7. Combined unitary filers must use the apportioning method (relative formula percentage) as outlined in Information Bulletin #12 and Tax Policy Directive #6. Omit cents; percents should be rounded two decimal places; read apportionment instructions.

Part I - Indiana Apportionment of Adjusted Gross Income

Sales/Receipts (less returns and allowances)

Include all non-exempt apportioned gross business income. Do not use non-unitary partnership income of previously apportioned income that must be separately reported as allocated income.

	Column A Total Within Indiana	Column B Total Within and Outside Indiana	Column C Indiana Percentage
Sales delivered or shipped			
to Indiana:			
Shipped from within	0.0		
Indiana	.00		
2. Shipped from outside			
Indiana	.00		
mulana	.00		
Sales shipped from Indiana to:			
3. The United States			
government	.00		
4. Purchasers in a state where			
the taxpayer is not subject to			
income tax (under P.L. 86-272)			
(for years beginning prior to	.00		
Jan. 1, 2016 only)			
Other			
5. Interest & other receipts from			
extending credit attributed to			
Indiana	.00		
6. Other gross business receipts	0.0		
not previously apportioned	.00		
7. Direct premiums and annuities			
received for insurance upon	.00		
property or risks in Indiana 8. Total Receipts: Add column A	.00		
receipts lines on 1A through			
7A and enter in line 8A. Enter			
all receipts on line 8B	8A .00	8B .00	
an recorpte errinine ob			
Apportionment of income for			
Indiana:			
9. Apportionment Percentage:			
Divide line 8A by line 8B (insert	as		
percent, not decimal)			9 100.00 %