Part II Supplemental Information. Complete this part to provide the information required by Part I, lines 30b, 32b, and 33. 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.

Attach to Form 990 or 990-EZ.

2010
Open to Public Inspection

Department of the Treasury Internal Revenue Service

INDIANAPOLIS MUSEUM OF ART, INC.

Employer identification number 35-0867955

PROCESS TO REVIEW FORM 990

FORM 990, PART VI, QUESTION 11B

THE CHIEF FINANCIAL OFFICER, FINANCE COMMITTEE CHAIR, AND DEPUTY DIRECTOR
OF PUBLIC AFFAIRS DO A DETAILED REVIEW OF THE FORM 990 BEFORE IT IS
SUPPLIED TO THE AUDIT COMMITTEE FOR THEIR REVIEW. THE ENTIRE BOARD
RECEIVES A COPY OF THE FORM 990 BEFORE IT IS FILED.

MONITORING & ENFORCEMENT OF COMPLIANCE WITH CONFLICT OF INTEREST POLICY
FORM 990, PART VI, LINE 12C
THE IMA HAS OFFICERS, DIRECTORS OR TRUSTEES, AND KEY EMPLOYEES COMPLETE
CONFLICT OF INTEREST QUESTIONNAIRES ANNUALLY. THE CFO REVIEWS THE
QUESTIONNAIRES ON AN ANNUAL BASIS. IF A CONFLICT IS NOTED, IT IS
SUMMARIZED ON A SEPARATE DOCUMENT THAT IS THEN PRESENTED TO THE BOARD AND
USED FOR COMPILATION OF THE 990. ANY BOARD MEMBER WHO HAS A CONFLICT OF
INTEREST ABSTAINS FROM VOTING ON THE RELATED ISSUE AND MAY NOT BE
INVOLVED IN ANY DISCUSSION PERTAINING TO THE PARTICULAR ISSUE.

PROCESS TO DETERMINE CEO, OFFICER, & KEY EMPLOYEE COMPENSATION

FORM 990, PART VI, LINES 15A & 15B

UNDER THE DIRECTION OF THE BOARD, THE HR DEPARTMENT GATHERS INDEPENDENT

MARKET DATA, INCLUDING THE AAMD SURVEY AND PROVIDES IT TO THE BOARD

COMMITTEE TO REVIEW AND USE IN DETERMINING THE CEO'S AND KEY EMPLOYEES'

SALARIES. THE CEO'S LAST COMPENSATION REVIEW TOOK PLACE IN MAY 2010. KEY

EMPLOYEE COMPENSATION WAS LAST REVIEWED IN JANUARY 2010.

DNCE 44

Name of the organization
INDIANAPOLIS MUSEUM OF ART, INC.

Employer identification number

AVAILABILITY OF GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY, & FS

FORM 990, PART VI, LINE 19

THE INDIANAPOLIS MUSEUM OF ART DOES NOT MAKE ITS GOVERNING DOCUMENTS AND

CONFLICT OF INTEREST POLICY AVAILABLE TO THE PUBLIC. HOWEVER, FINANCIAL

STATEMENTS AND THE FORM 990 ARE AVAILABLE ON THE WEBSITE.

OTHER CHANGES IN NET ASSETS OR FUND BALANCES

FORM 990, PART XI, LINE 5

UNREALIZED GAIN:

\$48,880,242

PURCHASES OF ART:

(1,351,377)

PROCEEDS FROM SALE OF ART:

313,000

CHANGES IN ACCUM. POSTRETIREMENT BENEFITS:

382,000

\$48,223,865

ATTACHMENT 1

FORM 990, PART III, LINE 1 - ORGANIZATION'S MISSION

AN EDUCATIONAL INSTITUTION IN THE HEART OF THE MIDWEST, THE INDIANAPOLIS MUSEUM OF ART SERVES THE CREATIVE INTERESTS OF ITS COMMUNITIES BY FOSTERING EXPLORATION OF ART, DESIGN, AND THE NATURAL ENVIRONMENT. THE IMA PROMOTES THESE INTERESTS THROUGH THE COLLECTION, PRESENTATION, INTERPRETATION AND CONSERVATION OF ITS ARTISTIC, HISTORIC, AND ENVIRONMENTAL ASSETS. THE INDIANAPOLIS MUSEUM OF ART HAS A COLLECTION OF OVER 50,000 WORKS OF ART. AT THE MUSEUM, YOU WILL FIND ART FROM A VARIETY OF CULTURES AND PERIODS IN ART HISTORY. THE MUSEUM ALSO FEATURES NATIONAL AND INTERNATIONAL TRAVELING EXHIBITIONS THROUGHOUT THE YEAR. UPON COMPLETION, THE VIRGINIA B. FAIRBANKS ART & NATURE PARK WILL PROVIDE AN URBAN OASIS WITH 100 ACRES OF WOODLANDS,

Name of the organization

INDIANAPOLIS MUSEUM OF ART, INC.

Employer identification number

ATTACHMENT 1 (CONT'D)

FORM 990, PART III, LINE 1 - ORGANIZATION'S MISSION

WETLANDS, LAKE AND MEADOWS LOCATED ADJACENT TO THE MUSEUM. THE PARK WILL CONTAIN OUTDOOR ART WORKS, AS WELL AS RECREATIONAL EXPERIENCES FOR VISITORS INCLUDING NATURE WALKS AND INTERACTIVE OUTDOOR ART EXHIBITIONS.

		ATTACHMENT	2
FORM 990, PART III, LINE 4D - OTHER PROGRAM SE	RVICES		
DESCRIPTION	GRANTS	EXPENSES	REVENUE
MUSEUM STORE AND RESTAURANT		2,121,302.	569,214.
TOTALS		2,121,302.	569,214.

ATTACHMENT 3

PART VII - CONTINUATION OF OFFICERS, DIRECTORS, TRUSTEES,
KEY EMPLOYEES AND HIGHEST COMPENSATED EMPLOYEES

(1)=IND.TRUSTEE/DIR. (2)=INS.TRUSTEE (3)=OFFICER (4)=KEY EMP. (5)=HIGHEST COMP. (6)=FORMER

			(C) POSITION	COMPENSATI	ON FROM	
	(A) NAME AND TITLE	(B) HOURS	(1)(2)(3)(4)(5)(6)	(D)ORG. (E)RE	L. ORG.	(F)OTHER
29	JENNIFER BARTENBACH					
	CHIEF FINANCIAL OFFICER	50.00	X	92,348.	0.	16,301.
30	SUE ELLEN PAXSON					
	DEPUTY DIR-COLLECTIONS & PROGR	50.00	X	230,587.	0.	9,624.
31	ROBERT STEIN					
	DEPUTY DIR-RESEARCH, TECH, ENGAG	50.00	X	141,894.	0.	13,908.
32	ELLEN LEE					
	WOOD-PULLIAM SENIOR CURATOR	50.00	X	163,249.	0.	12,769.
33	GREGORY SMITH					
	SR CONSERVATION SCIENTIST	50.00	X	124,802.	0.	8,815.
34	J. NICHOLAS CAMERON					
	CHIEF OPERATING OFFICER	50.00	X	188,622.	0.	6,236.

ATTACHMENT 4

INDIANAPOLIS, IN 46202

Page 2

Name of the organization
INDIANAPOLIS MUSEUM OF ART, INC.

Employer identification number

ATTACHMENT 4 (CONT'D)

990, PART VII- COMPENSATION OF THE FIVE HIGHEST PAID IND. CONTRACTORS

NAME AND ADDRESS	DESCRIPTION OF SERVICES	COMPENSATION
GEUPEL DEMARS HAGERMAN, LLC 10315 ALLISONVILLE ROAD FISHERS, IN 46038-2017	CONSTRUCTION	351,271.
RESNICOW SCHROEDER & ASSOCIATES 1995 BROADWAY 11TH FLOOR NEW YORK, NY 10023	PUBLIC RELATIONS	245,904.
HAGERMAN, INC PO BOX 11848-1848 FORT WAYNE, IN 46861	CONSTRUCTION	398,788.
E.U.R.L. GRAPPA 74, RUE DU ROCHER 75008 PARIS FRANCE	EXHIBIT INSTALLATION	184,811.
INDIANAPOLIS FABRICATION 1125 BROOKSIDE AVENUE	EXHIBIT INSTALLATION	154,065.

TOTAL COMPENSATION

1,334,839.

SCHEDULE R (Form 990)

Department of the Treasury Internal Revenue Service

Name of the organization

INDIANAPOLIS MUSEUM OF ART, INC.

Related Organizations and Unrelated Partnerships

► Complete if the organization answered "Yes" to Form 990, Part IV, line 33, 34, 35, 36, or 37. ▼ See separate instructions. ► Attach to Form 990.

2010

OMB No. 1545-0047

Open to Public Inspection

Employer Identification number

35-0867955

			17 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	(-)	47		
(a) Name, address, and EIN of disregarded entity	garded entity	ш.	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Total income	(e) End-of-year assets	(f) Direct controlling entity
OLDFIELDS, LLC 0 MICHIGAN ROAD INE	INDIANAPOLIS, IN 46208		REAL ESTATE	IN	30.	18,670.	N/A
			p				1 1277
Identification of Related Tax-Exempt Organizations (Complete if the organization answered "Yes" on Form 990, Part IV, line 34 because it had one or more related tax-exempt organizations during the tax year.)	npt Organizations (Complanizations during the tax)	lete if the org	ganization answ	rered "Yes" on F	orm 990, Part IV	line 34 because	it had
(a) Name, address, and EIN of related organization	ion	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Exempt Code section	(e) Public charity status (if section 501(c)(3))	(f) Direct controlling entity	(9) Section 512(b)(13) controlled entity?
							Yes No
							20 17
For Paperwork Reduction Act Notice, see the Instructions for Form 990.	rm 990.						C. C

PAGE 48

Schedule R (Form 990) 2010

Identification of Related Organizations Taxable as a Partnership (Complete if the organization answered "Yes" on Form 990, Part IV, line 34 because it had one or more related organizations treated as a partnership during the tax year.) Part III

because it had one of more related organizations treated as a partnership during the tax year.)	nore related organ	izations	treated as a par	tnersnip during t	ne tax year.)					
(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign	(d) Direct controlling entity	(e) Predominant income (related, unrelated, excluded from tax under	Share of total income	(g) Share of end-of-year assets	(h) Disproportionata allocations?	(i) Code V-UBI amount in box 20 of Schedule K-1	(I) General or managing partner?	(k) Percentage ownership
		country)		sections 512-514)			Yes	(Form 1065)	Yes	
(1)										
(2)										
(3)										
(4)										
(5)										
(9)										
(7)										
Partiv Identification of Related Organizations Taxable as a Corporation or Trust(Complete if the organization answered "Yes" on Form 990, Part IV, line 34 because it had one or more related organizations treated as a corporation or trust during the tax year.)	l ed Organizations T one or more related	axable organiz	as a Corporatio	n or Trust(Com	plete if the organ pr trust during t	anization answer	ed "Yes" o	n Form 990,	Part IV,	
(a) Name, address, and EIN of related organization	elated organization		(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Direct controlling entity		(f) Share of total income		(g) Share of end-of-year assets	(h) Percentage ownership
(1) A.J.P. CHARITABLE LEAD 1200 WEST 38TH STREET INDIANAPOLIS, IN 46208	1 1	35-6698176	CHAR LEAD TRU	Z	K/N	TRUST	24.282		431 560	000
(2) C.B. CHARITABLE UNITRUST 270 PARK AVENUE NEW YORK, NY 10C	NY 10017-2014		CHAR LEAD TRU	11	N/A	TRUST			1,145,200.	100.0000
(3)		1								
(4)										

Schedule R (Form 990) 2010

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(9)

(9)

0

	ons With Related Organizations (Complete if the organization answered "Yes" to Form 990, Part IV, line 34, 35, 35a, or 36.)
chedule R (Form 990) 2010	V Transactions With
Schedule R	Part \

			Yes	No No
Note. Comple	Note. Complete line 1 if any entity is listed in Parts II, III, or IV of this schedule.		STORY BOOK	- 1
1 During th	During the tax year, did the organization engage in any of the following trainsections with one of more related organizations instead in the contractions are the contractions and the contractions in the contractions are		12	×
a Receipt o	Receipt of (i) interest (ii) annuities (iii) royalties or (iv) rent from a controlled entity	•	10	×
b Giff, gran	Gift, grant, or capital contribution to other organization(s)	•	100	×
c Gift, gran	Gift, grant, or capital contribution from other organization(s)		75	×
d Loans or	Loans or loan guarantees to or for other organization(s)		3 4	>
e Loans or	Loans or loan guarantees by other organization(s)		· · · · · · · · · · · · · · · · · · ·	
			45	>
Sale of a	Sale of assets to other ordanization(s)			:
Purchase	Purchase of assets from other organization(s)		19	× :
	and the state of t		두	×
	Excliming of assets and the contract of the constant of the co	•	;=	×
l Lease of	Lease of facilities, equipment, or other assets to other organization(s)			0110
			÷	×
j Lease of	Lease of facilities, equipment, or other assets from other organization(s)		= ==	×
k Performa	Performance of services or membership or fundraising solicitations for other organization(s)		4 ;	: >
I Performa	Performance of services or membership or fundraising solicitations by other organization(s)		=	4 :
. Sharing	•		E.	× :
			4	×
n snaring c				6.
			10	×
o Reimburs	Reimbursement paid to other organization for expenses		10	×
p Reimburs	Reimbursement paid by other organization for expenses	•	が発見道	
			10	×
	Other transfer of cash or property to other organization(s)	•	-	×
	Other transfer of cash or property from other organization(s)	soction threshol	4	
2 If the ans	If the answer to any of the above is "Yes," see the instructions for information on Who must complete this line, including covered relationables and to	מכונסוו חווספווסו	.1	
	(a) (b) (c) Name of other organization Amount involved type (a–r)		(u) Method of determining amount involved	<u>D</u> a
\$			1	
(2)				
(3)				
(4)				
(2)				Ī
(9)			1000	
JSA		O COMPANY	Schedule A (Point 330) 2010	2
0E1309 1.000		у.		

Unrelated Organizations Taxable as a Partnership (Complete if the organization answered "Yes" on Form 990, Part IV, line 37.) Part VI

Provide the following information for each entity taxed as a partnership through which the organization conducted more than five percent of its activities (measured by total assets or gross revenue) that was not a related organization. See instructions regarding exclusion for certain investment partnerships.

(a) Name, address, and EiN of entity	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Are all partners section 501(c)(3) organizations?	(e) Share of end-of-year assets	(f) Disproportionate allocations?	(9) Code V-UBI amount in box 20 of Schedule K-1	(h) General or managing partner?
(i)			Yes		Yes No	(200	Yes
(<u>z</u>)						Į.	
(3)							
(4)							
(9)							
(9)							
(1)		77					
(8)							
(6)							
(10)							
(11)							
$(1\overline{2})$							
(13)			= =				
(14)					22		
(15)							
(16)					91		
						Schedule R (Form 990) 2010	990) 2010

Schedule R (Form 990) 2010

Page 5

Part VII

Supplemental Information
Complete this part to provide additional information for responses to questions on Schedule R (see instructions).

Form 8621

(Rev. December 2004) Department of the Treasury

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

OMB No. 1545-1002

Attachment

Internal Revenue Service Separate Instructions.	Sequence No. 03
Name of shareholder	Identifying number (see page 2 of instructions)
INDIANAPOLIS MUSEUM OF ART, INC. Number, street, and room or suite no. (If a P.O. box, see page 2 of instructions.)	35-0867955
	Shareholder tax year: calendar year or other tax year beginning 07/01/2010 and ending 06/30/2011
4000 MICHIGAN ROAD City or town, state, and ZIP code or country	beginning 07/01/2010 and ending 06/30/2011
INDIANAPOLIS IN 46208	
Check type of shareholder filing the return: Individual X Corporation Partnership	S Corporation Nongrantor Trust Estate
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number(if any)
NORTHERN DYNASTY MINERALS LTD.	FOREIGNUS
Address (Enter number, street, city or town, and country.)	Tax year of company or fund: calendar year -2010 or other
1020-800 EST PENDER STREET V6C 2V6	tax year beginning and
VANCOUVER CA	ending .
Part I Elections (See instructions.)	
Fig. 45 on To Tour 44b - BEIG on a OFF II a shoreholder of a BEIG short to treat the B	FIG. on a OFF Complete Engage to through Co. of Don't H
B Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the P Deemed Sale Election. I. a shareholder on the first day of a PFIC's first tax year a	
B Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year a sale of my interest in the PFIC. Enter gain or loss on line 10f of Part IV.	sa QEF, elect to recognize gain on the deemed
Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first	tax year as a QEF that is a controlled foreign
corporation (CFC), elect to treat an amount equal to my share of the post-1986 distribution. Enter this amount on line 10e of Part IV.	earnings and profits of the CFC as an excess
Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect undistributed earnings and profits of the QEF until this election is terminated. Countries that may be deferred.	to extend the time for payment of tax on the mplete lines 3a through 4c of Part II to calculate
Note: If any portion of line 1a or line 2a of Part II is includible under section	
Also, see sections 1294(c) and 1294(f) and the related regulations for events that to	
E Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a fo applies, elect to treat as an excess distribution the gain recognized on the deeme	rmer PFIC or a PFIC to which section 1297(e) and sale of my interest in the PFIC or, if I qualify.
my share of the PFIC's post-1986 earnings and profits deemed distributed, on t	he last day of its last tax year as a PFIC under
section 1297(a). Enter gain on line 10f of Part IV. F Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to ma	ark-to-market the PEIC stock that is marketable
within the meaning of section 1296(e). Complete Part III.	an-to-market the 1110 stock that is marketable
Part II Income From a Qualified Electing Fund (QEF). All QEF shareholde	rs complete lines 1a through 2c. If you are making
Election D, also complete lines 3a through 4c. (See page 5 of instructions.)	
1a Enter your pro rata share of the ordinary earnings of the QEF 1a	
b Enter the portion of line 1a that is included in income under	
section 551 or 951 or that may be excluded under section 1293(g)	0670
c Subtract line 1b from line 1a. Enter this amount on your tax return as dividend income	108-72
2a Enter your pro rata share of the total net capital gain of the QEF 2a	29 TAU
b Enter the portion of line 2a that is included in income under section 551 or 951 or that may be excluded under section 1293(g) 2b	
c Subtract line 2b from line 2a. This amount is a net long-term capital gain. Enter	
in Part II of the Schedule D used for your income tax return. (See instructions.)	1 = 1
3a Add lines 1c and 2c	3a
b Enter the total amount of cash and the fair market value of other	14b
property distributed or deemed distributed to you during the tax	
year of the QEF.(See instructions.) 3b	
c Enter the portion of line 3a not already included in line 3b that is	
attributable to shares in the QEF that you disposed of, pledged, or	
otherwise transferred during the tax year	2.4
d Add lines 3b and 3c	
e Subtract line 3d from line 3a, and enter the difference (if zero or less, enter amount in brackets	(degt)
Important: If line 3e is greater than zero, and no portion of line 1a or 2a is including under section 551 or 951, you may make Election D with respect to the amount on line 3e.	ible in income
4a Enter the total tax for the tax year (See instructions.)	
b Enter the total tax for the tax year determined without regard to the arrount entered on line 3e	
the amount entered on line 3e	of which is
extended by making Election D. See instructions	

ADDITIONAL INFORMATION REQUIRED TO BE ATTACHED TO FORM 8621, LINE 11a - HOLDING PERIOD OF STOCK

THE PARTNERSHIP HAS MADE CERTAIN INVESTMENTS IN PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICs") THAT ARE SUBJECT TO IRC SECTION 1291 ("SECTION 1291 FUNDS"). ALTHOUGH YOUR ALLOCABLE SHARE OF SUCH 1291 FUND INCOME IS ALREADY INCLUDED WITHIN YOUR SCHEDULE K-1, YOU MAY BE REQUIRED TO FILE IRS FORM 8621 TO REPORT YOUR INDIRECT INTEREST IN SUCH SECTION 1291 FUNDS. INCLUDED IS THE INFORMATION NECESSARY TO COMPLETE THE FORM.

THE TAX RULES RELATING TO PFIC INVESTMENTS ARE COMPLEX AND YOU ARE ADVISED TO CONSULT WITH YOUR TAX ADVISOR.

PFIC NAME:

NORTHERN DYNASTY MINERALS LTD.

PFIC ADDRESS:

1020-800 WEST PENDER STREET VANCOUVER, BC CANADA V6C 2V6

EIN:

N/A

TAX YEAR:

1/1/10 - 12/31/10

			TOTAL GAIN OR LOSS FROM	EXCESS DISTRIBUTION
	. "	NUMBER OF	THE DISPOSITION OF STOCK	ALLOCABLE TO
DATE	DATE	DAYS HELD	OF A SECTION 1291 FUND	CURRENT YEAR
ACQUIF	RED SOLD	LINE 11a	LINE 10f	<u>LINE 115</u>
8/9/20	10 12/9/2010	123	1	1
8/10/20	12/9/2010	122	111	111
8/11/20	12/9/2010	121	37	37
8/12/20	12/9/2010	120	44	44
8/18/20	12/9/2010	114	H 1	1
9/20/20	12/9/2010	81	22	22
9/20/20	10 12/9/2010	81	17	17
8/11/20	12/10/2010	122	2	2
8/10/20	12/9/2010	122	45 5	455
8/10/20	10 12/9/2010	122	198	198
8/11/20	12/9/2010	121	362	362
8/12/20	12/9/2010	120	108	108
8/13/20	12/9/2010	119	76	76
8/16/20	12/9/2010	116	12	12
8/20/20	12/9/2010	112	30	30
8/23/20	12/9/2010	109	29	29
8/24/20	12/9/2010	108	114	114
8/25/20	12/9/2010	107	48	48
8/26/20	12/9/2010	106	103	103
8/27/20	12/9/2010	105	5	5
8/30/20	12/9/2010	102	26	26
		TOTAL	<u>1.801</u>	1.801

	8621 (Rev. 12-2004)	Erom Mark to B	Acres Election	- (Saa -a-a F a	finalmistic no V			Page 2
	Gain or (Loss)							
5	Enter the fair market va				• • • • • • • • • • • •			
6	Enter your adjusted bas		•		• : • • : • • • • • •	6		
7	Excess. Subtract line 6	_	, stop here. Inclu	ide this amount as o	ordinary income			
_	on your tax return. If a l							
8	Enter any unreversed in							
9	Enter the smaller of line	e 7 or line 8. Include t	this amount as an o	ordinary loss on you	ur tax return	9		
Par	t IV Distributions I Complete a se	From and Dispo: paratePart IV for				page 6	of inst	tructions.)
10a	Enter your total distribu					T		
	the applicable stock. If	the holding period of	of the stock began	in the current tax	year, see instructions	10a		0
b	Enter the total distributions but not respect to the applica shorter, the portion of	outions (reduced by included in income able stock for each the shareholder's ho	y the portions of under section 1 of the 3 years lding period before	f such distribution 1291(a)(1)(B)) mad preceding the cu e the current tax y	s that were excess de by the fund with irrent tax year (or if ear)	10b		
C						10c		
d	Multiply line 10c by 125%	(1.25).				10d		
е	Subtract line 10d from respect to the applicab do not complete the riduring the current tax on your income tax returns.	le stock. If zero or le rest of Part IV. See year. Also, see inst	ess and you did no instructions if you ructions for rules	ot dispose of stock u received more t for reporting a no	during the tax year, han one distribution enexcess distribution	10e		0
f	Enter gain or loss from							
	fund. If a gain, complete	10f		1,801				
11a	Attach a statement each share of stock your holding period. Ac		SEE	STATEMENT				
b				1 001				
_	Enter the aggregate i			and toy year in	vour holding period	11b	-	1,801
·	(other than the current					144-		
						11c		
u	Foreign tax credit. (See	m line 11e Enter	this assert on .		• • • • • • • • • • • • • • • • • • •	11d		
е	Subtract line 11d from					1		
	tax." (See instructions.)					11e		
T	Determine interest or							
Bar	methods of section 662	21. Enter the aggreg	ate amount of inte	erest here. (See ins	structions.)	11f		
Par	Complete a se	parate column for tion of the section	or each outstai	nding election.	on of Section 1294 Complete lines 9	and 1	ions O only	/ if there is a
		(i)	(ii)	(iii)	(iv)	(v)		(vi)
1	Tax year of outstanding						61	, ,
	election							
2	Undistributed earnings to							
	which the election relates							
3	Deferred tax							
4	Interest accrued on deferred							
	tax (line 3) as of the filing date							
						-		
5	Event terminating election							
6	Earnings distributed or deemed							
	distributed during the tax year							
7	Deferred tax due with this							
	return							
8	Accrued interest due with							
	this return							
	Deferred tax outstanding after	ALL DESIGNATION OF THE PROPERTY OF THE PROPERT			All and the second second second second	ELA:	WE BUILD	March School (March School)
	partial termination of election							
10	Interest accrued after partial							
	termination of election · · ·							

FORM 8621 SUPPORTING SCHEDULES

NAME OF	PFIC	OR	OEF:	 	

NORTHERN DYNASTY MINERALS LTD.

PART IV, LINE 11A - DIST AND I	DISP OF STOCK IN	SECTION 129	1 FUND
DESCRIPTION	ACQUIRED	SOLD	AMOUNT
SEE ATTACHMENT	VAR	VAR	1,801.
	TOTAL		1,801.

Form **8621**(Rev. December 2004) Department of the Treasury

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

OMB No. 1545-1002

Attachment

ntemal Revenue Service See Separate Instructions.	Sequence IVO. 05
Name of shareholder	Identifying number (see page 2 of instructions)
INDIANAPOLIS MUSEUM OF ART, INC.	35-0867955
Number, street, and room or suite no. (If a P.O. box, see page 2 of instructions.)	Shareholder tax year: calendar year or other tax year
4000 MICHIGAN ROAD	beginning 07/01/2010 and ending 06/30/2011
City or town, state, and ZIP code or country	
INDIANAPOLIS IN 46208	
Check type of shareholder filing the return: 🔲 Individual 🐰 Corporation 🔲 Partnership 🗌	S Corporation Nongrantor Trust Estate
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number(if any)
OSISKO MINING CORPORATION	FOREIGNUS
Address (Enter number, street, city or town, and country.)	Tax year of company or fund: calendar year 2010_ or other
1100, AVENUE DES CANADIENS-DE-MONTR H3B 2S2	tax year beginning and
MONTREAL CA	ending
Part I Elections (See instructions.)	
Tatel Electronic (Coo monactions.)	
Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the F	PEIC as a QEE Complete lines 1a through 2c of Part II
Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year a	
sale of my interest in the PFIC. Enter gain or loss on line 10f of Part IV.	as a QLI , cicot to recognize gain on the decimed
	tay year as a OEE that is a controlled foreign
Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first corporation (CFC), elect to treat an amount equal to my share of the post-1986	S earnings and profits of the CFC as an excess
distribution. Enter this amount on line 10e of Part IV.	or carrings and prome or the or o as an excess
Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elec	t to extend the time for navment of tax on the
undistributed earnings and profits of the QEF until this election is terminated. Co	omplete lines 3a through 4c of Part II to calculate
the tax that may be deferred.	
Note: If any portion of line 1a or line 2a of Part II is includible under section	551 or 951, you may not make this election.
Also, see sections 1294(c) and 1294(f) and the related regulations for events that	
E Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a for applies, elect to treat as an excess distribution the gain recognized on the deemer	ed sale of my interest in the PFIC or if I qualify
my share of the PFIC's post-1986 earnings and profits deemed distributed, on	the last day of its last tax year as a PFIC under
section 1297(a). Enter gain on line 10f of Part IV.	
Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to m	ark-to-market the PFIC stock that is marketable
within the meaning of section 1296(e). Complete Part III.	
Part II Income From a Qualified Electing Fund (QEF). All QEF shareholder	ers complete lines 1a through 2c. If you are making
Election D, also complete lines 3a through 4c. (See page 5 of instructions.)	
1a Enter your pro rata share of the ordinary earnings of the QEF 1a	
b Enter the portion of line 1a that is included in income under	
section 551 or 951 or that may be excluded under section 1293(g) 1b	
c Subtract line 1b from line 1a. Enter this amount on your tax return as dividend income	1c
2a Enter your pro rata share of the total net capital gain of the QEF 2a	6/6 h
b Enter the portion of line 2a that is included in income under	re-A
section 551 or 951 or that may be excluded under section 1293(g) 2b	and the second s
c Subtract line 2b from line 2a. This amount is a net long-term capital gain. Enter	er this arnount
in Part II of the Schedule D used for your income tax return. (See instructions.)	
3a Add lines 1c and 2c	3a
b Enter the total amount of cash and the fair market value of other	
property distributed or deemed distributed to you during the tax	er.Lb
year of the QEF.(See instructions.)	
c Enter the portion of line 3a not already included in line 3b that is	
attributable to shares in the QEF that you disposed of, pledged, or	
otherwise transferred during the tax year3c	2
d Add lines 3b and 3c	3d
e Subtract line 3d from line 3a, and enter the difference (if zero or less, enter amount in brackets	3e
•	Energia
Important: If line 3e is greater than zero, and no portion of line 1a or 2a is included and the second of the second of line 3c.	aible in income
under section 551 or 951, you may make Election D with respect to the amount on line 3e. 4a Enter the total tax for the tax year (See instructions.)	
b Enter the total tax for the tax year determined without regard to	
the amount entered on line 3e	
c Subtract line 4b from line 4a. This is the deferred tax, the time for payment	1.1
extended by making Election D. See instructions	4c

ADDITIONAL INFORMATION REQUIRED TO BE ATTACHED TO FORM 8621, LINE 11a - HOLDING PERIOD OF STOCK

THE PARTNERSHIP HAS MADE CERTAIN INVESTMENTS IN PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICs") THAT ARE SUBJECT TO IRC SECTION 1291 ("SECTION 1291 FUNDS"). ALTHOUGH YOUR ALLOCABLE SHARE OF SUCH 1291 FUND INCOME IS ALREADY INCLUDED WITHIN YOUR SCHEDULE K-1, YOU MAY BE REQUIRED TO FILE IRS FORM 8621 TO REPORT YOUR INDIRECT INTEREST IN SUCH SECTION 1291 FUNDS. INCLUDED IS THE INFORMATION NECESSARY TO COMPLETE THE FORM.

THE TAX RULES RELATING TO PFIC INVESTMENTS ARE COMPLEX AND YOU ARE ADVISED TO CONSULT WITH YOUR TAX ADVISOR.

PFIC NAME:

OSISKO MINING CORPORATION

PFIC ADDRESS:

WINDSOR STATION, SUITE 300

1100, AVENUE DES CANADIENS-DE-MONTREAL

P.O. BOX 211

MONTREAL, QUEBEC, CANADA H3B 2S2

EIN:

NA

TAX YEAR:

1/1/10 - 12/31/10

			TOTAL GAIN OR LOSS FROM	EXCESS DISTRIBUTION
		NUMBER OF	THE DISPOSITION OF STOCK	ALLOCABLE TO
DATE	DATE	DAYS HELD	OF A SECTION 1291 FUND	CURRENT YEAR
ACQUIRED	SOLD	LINE 11a	LINE 10f	<u>LINE 11b</u>
3/17/2010	4/23/2010	38	34	34
3/17/2010	4/26/2010	41	33	33
4/1/2010	4/26/2010	26	12	12
4/1/2010	4/27/2010	27	45	45
3/18/2010	4/27/2010	41	23	23
3/18/2010	4/27/2010	41	34	34
2/18/2010	<i>4/</i> 27 <i>/</i> 2010	69	174	174
3/31/2010	4/27/2010	28	6	6
3/31/2010	4/29/2010	30	80	80
3/31/2010	<i>4/</i> 29 <i>/</i> 2010	30	246	246
2/19/2010	4/29/2010	70	116	116
3/22/2010	4/29/2010	39	235	235
2/3/2010	4/29/2010	86	121	121
2/4/2010	4/30/2010	86	101	101
3/22/2010	4/30/2010	40	475	475
2/1/2010	5/6/2010	95	_ 15	15
2/4/2010	5/6/2010	92	350	350
5/7/2010	5/11 <i>[</i> 2010	5	30	30
5/7/2010	5/11/2010	5	67	67
5/7/2010	5/11/2010	5	29	29

CONTINUED ON NEXT PAGE

PFIC NAME:

OSISKO MINING CORPORATION

			TOTAL GAIN OR LOSS FROM	EXCESS DISTRIBUTION
		NUMBER OF	THE DISPOSITION OF STOCK	ALLOCABLE TO
DATE	DATE	DAYS HELD	OF A SECTION 1291 FUND	CURRENT YEAR
ACQUIRED	SOLD	LINE 11a	LINE 10f	LINE 11b
5/7/2010	5/12/2010	6	20	20
5/12/2010	6/18/2010	38	91	91
5/13/2010	6/18/2010	37	22	22
5/13/2010	6/22/2010	41	0	0
5/13/2010	6/22/2010	41	4	4
5/13/2010	6/22/2010	41	8	8
5/13/2010	6/23/2010	42	7	7 - 😥
5/13/2010	6/23/2010	42	10	10
5/13/2010	6/25/2010	44	35	35
5/7/2010	6/25/2010	50	91	91
5/7/2010	6/28/2010	5 3	53	53
7/26/2010	7/30/2010	5	87	87
7/19/2010	7/30/2010	12	0	0
7/26/2010	7/30/2010	5	112	112
7/19/2010	7/30/2010	12	76	76
7/19/2010	8/10/2010	23	152	152
7/19/2010	8/10/2010	23	164	164
7/26/2010	8/10/2010	16	47	47
7/19/2010	8/10/2010	23	12	12
7/15/2010	8/10/2010	27	104	104
7/16/2010	8/10/2010	26	66	66
7/16/2010	8/16/2010	32	54	54
7/14/2010	8/16/2010	34	110	110
7/14/2010	8/17/2010	35	175	175
5/7/2010	8/17/2010	103	24	24
5/10/2010	8/17/2010	100	178	178
5/10/2010	8/18/2010	101	154	154
7/7/2010	8/18/2010	43	197	197
7 <i>/7/</i> 2010	8/18/2010	43	226	226
5/18/2010	8/18/2010	93	170	170
5/19/2010	8/18/2010	92	278	278
5/19/2010	8/19/2010	93	344	344
2/1/2010	8/19/2010	200	1,074	1,074
2/1/2010	8/19/2010	200	861	861
1/28/2010	8/19/2010	204	89	89
1/28/2010	8/20/2010	20 5	425	425
2/5/2010	8/20/2010	197	1,183	1,183
2/5/2010	8/23/2010	200	378	378
2/5/2010	8/24/2010	201	238	238
1/29/2010	8/24/2010	208	59	59
IIAGIAU IV				

CONTINUED ON NEXT PAGE

PFIC NAME:

OSISKO MINING CORPORATION

			TOTAL GAIN OR LOSS FROM	EXCESS DISTRIBUTION
		NUMBER OF	THE DISPOSITION OF STOCK	ALLOCABLE TO
DATE	DATE	DAYS HELD	OF A SECTION 1291 FUND	CURRENT YEAR
ACQUIRED	SOLD	LINE 11a	LINE 10f	<u>LINE 11b</u>
1/29/2010	8/26/2010	210	209	209
8/5/2010	8/31/2010	27	13	13
8/5/2010	9/1/2010	28	15	15
7/28/2010	9/3/2010	38	13	13
	9/7/2010	43	144	144
7/27/2010	9/7/2010	43	140	140
7/27/2010	9/7/2010	43	369	369
7/27/2010	9/7/2010	42	72	72
7/28/2010	9/7/2010	222	293	293
1/29/2010	9/7/2010	222	235	235
1/29/2010	9/8/2010	223	134	134
1/29/2010	12/14/2010	2	22	22
12/13/2010	1211-112010		*	
		TOTAL	<u>11.279</u>	<u>11.279</u>

	8621 (Rev. 12-2004)			<i>'</i> 0	5 :		Page 2
	Gain or (Loss)						
5	Enter the fair market va						
6 7	Enter your adjusted bas Excess. Subtract line 6				ordinary income		
•	on your tax return. If a le					7	
8	Enter any unreversed in		in section 1296(d))	See instructions		•	
9	Enter the smaller of line					. 9	
_	t IV Distributions F						of instructions.)
		paratePart IV for				радо о	
10a	Enter your total distributhe applicable stock. If			•	•		0
b							V
c	m: : : : : : : : : : : : : : : : : : :					. 10c	
d	Multiply line 10c by 125%	. ,				. 10d	
е	Subtract line 10d from respect to the applicable do not complete the reduring the current tax on your income tax returns.	le stock. If zero or le rest of Part IV. See year. Also, see insti	ess and you did no instructions if you ructions for rules	t dispose of stock received more to for reporting a no	during the tax yea han one distribution onexcess distribution	ır,	0
f	Enter gain or loss from	m the disposition of	stock of a section	n 1291 fund or 1	former section 129	1	
	fund. If a gain, complete	e line 11. If a loss, s	how it in brackets	and <mark>do not</mark> comple	ete line 11	. 10f	11,279
11a	Attach a statement each share of stock your holding period. Ac	or block of shares	held. Allocate the	e excess distribut	tion to each day	52.5528.53V	SEE STATEMENT
b	Enter the total of the and tax years before amounts on your incom	the foreign corpora	ation became a F	PFIC (pre-PFIC tax	vears). Enter thes	se Essen	11,279
С	Enter the aggregate i						
	(other than the current						
d	Foreign tax credit. (See						
е	Subtract line 11d from						
	tax." (See instructions.)					. 11e	
f					- 10		
	methods of section 662						
Par		Year Section 12					a ons O only if there is a
	nartial terminal	tion of the section	n 1294 electio	เนเกิด อเองแบก. า	Complete illes	9 and 1	o only il there is a
	partial torrinia	(i)	(ii)	(iii)	(iv)	(v)	(vi)
1	Tax year of outstanding		(11)	(111)	(117)	<u></u>	
•	election						
2	Undistributed earnings to						***************************************
	which the election relates						
3	Deferred tax						
	Interest accrued on deferred						
	tax (line 3) as of the filing date						
_	F						
	Event terminating election						
	Earnings distributed or deemed		i i				
	distributed during the tax year Deferred tax due with this						
	return						
	Accrued interest due with					u coe Miles e Coession	
	this return					To Miles	
9	Deferred tax outstanding after			ALCOHOLD INCIDENT			A STATE OF THE STA
	partial termination of election						
10	Interest accrued after partial	I		100			
	termination of election	1	1				

FORM 8621 SUPPORTING SCHEDULES

NAME OF PFIC OR OEF:

OSISKO MINING CORPORATION

PART IV, LINE 11A - DIST AND D	ISP OF STOCK IN	SECTION	1291 FUND
DESCRIPTION	ACQUIRED	SOLD	AMOUNT
SEE ATTACHMENT	VAR	VAR	11,279.
	TOTAL		11,279.

Form **8621**(Rev. December 2004) Department of the Treasury

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

OMB No. 1545-1002

Attachment Sequence No. 69

Internal Revenue Service	► See separate	instructions		Sequence No. 05
Name of shareholder			Identifying number	(see page 2 of instructions)
INDIANAPOLIS MU	JSEUM OF ART, INC.		35-086795	<u> 55 </u>
Number, street, and room or suite n	no. (If a P.O. box, see page 2 of instructions.)		Shareholder tax year: ca	slendar year or other tax year
4000 MICHIGAN F	ROAD		beginning 07/01	/2010 and ending 06/30/2011
City or town, state, and ZIP code or	country			
INDIANAPOLIS	IN 46208			
Check type of shareholder filing	g the return: Individual X Corporation	Partnership	S Corporation	Nongrantor Trust Estate
Name of passive foreign investment	t company (PFIC) or qualified electing fund (QEF)		Employer Identifica	tion number(if any)
TOREX GOLD RESC	OURCES INC.		FOREIGNUS	3
Address (Enter number, street, city			Tax year of company or	fund: calendar year 2012_ or other
145 KING ST. WE	EST, SUITE 1502 M5	H 1J8		and
TORONOTO	CA		ending	
Part I Elections (See	e instructions.)			
B Deemed Sale Elect sale of my interest is sale of my interest in the sale of the sale of the process of	on of line 1a or line 2a of Part II is includible 1294(c) and 1294(f) and the related regulation in the gain on Deemed Sale of PFIC. I, a sheat as an excess distribution the gain recognizer fic's post-1986 earnings and profits deemed intergain on line 10f of Part IV. To-Market PFIC Stock. I, a shareholder of a	C's first tax yeart IV. of a PFIC's for the post- er of a QEF, is terminated, size under sectors for events to the post- mareholder of ped on the ded distributed,	ear as a QEF, elect to first tax year as a Q 1986 earnings and p elect to extend the to Complete lines 3a to extion 551 or 951, year that terminate this ele a former PFIC or a eemed sale of my into on the last day of it	Definition of the deemed are that is a controlled foreign profits of the CFC as an excess time for payment of tax on the through 4c of Part II to calculate ou may not make this election. The ection of the period
Part II Income From	of section 1296(e). Complete Part III. n a Qualified Electing Fund (QEF). mplete lines 3a through 4c. (See page 5 of instructi		holders complete lines	1a through 2c. If you are making
	re of the ordinary earnings of the QEF	1a		
	line 1a that is included in income under			
·	hat may be excluded under section 1293(g)	1b		
	ne 1a. Enter this amount on your tax return as divide			1c
	e of the total net capital gain of the QEF	2a		CITE SA
• •	line 2a that is included in income under			
•	hat may be excluded under section 1293(g)	2b	×	
	n line 2a. This amount is a net long-term		Enter this amount	
	e D used for your income tax return. (See instruction			2c
	·			3a
	at of cash and the fair market value of other			1999
	or deemed distributed to you during the tax			to de
year of the QEF.(See in:	structions.)	3b		
c Enter the portion of li	ine 3a not already included in line 3b that is			新型
attributable to shares	in the QEF that you disposed of, pledged, or			E Unit
otherwise transferred do	uring the tax year	3c		
d Add lines 3b and 3c				3d
e Subtract line 3d from lir	ne 3a, and enter the difference (if zero or less, enter	r amount in bra	ickets)	3e
Important: If line 3e under section 551 or 95	is greater than zero, and no portion of line : 51, you may make Election D with respect to the an	1a or 2a is in nount on line 3e	ncludible in income	10 - 10 - 10 - 10 - 10 - 10 - 10 - 10 -
	e tax year (See instructions.)	4a		(\$ t)
	or the tax year determined without regard to	4h		
	line 3e	4b		Section 200
	m line 4a. This is the deferred tax, the flection D. See Instructions		1	4c
extenned ov making e	1001.115.015.74. 23000 110311111111111111111111111111111			

	8621 (Rev. 12-2004)							Page 2
Par	Gain or (Loss)							
5	Enter the fair market va	•				-		
6	Enter your adjusted bas					. 6		
7	Excess. Subtract line 6	from line 5. If a gain,	stop here. Includ	le this amount as o	rdinary income			
	on your tax return. If a lo					. 7		
8	Enter any unreversed in	clusions (as defined	in section 1296(d))	. See instructions.				
9	Enter the smaller of line					. 9		
Par	t IV Distributions F	rom and Dispos	itions of Stock	of a Section 1	291 Fund (See	page 6	of inst	ructions.)
	Complete a se	paratePart IV for	each excess d	istribution (see	instructions).			
10a	Enter your total distribu	tions from the secti	on 1291 fund duri	ng the current tax	year with respect t	0		
	the applicable stock. If							0
b	Enter the total distrib distributions but not i respect to the applica shorter, the portion of t	utions (reduced by included in income able stock for each the shareholder's hol	the portions of under section 1: of the 3 years ding period before	such distributions 291(a)(1)(B)) mad preceding the cu the current tax ye	that were excesse by the fund wife rrent tax year (or ear)	ss h if . 10b		
C	Divide line 10b by 3. (Se							
d	Multiply line 10c by 125% ((1.25)				. 10d		
е	Subtract line 10d from respect to the applicabl do not complete the r during the current tax on your income tax retu	le stock. If zero or le est of Part IV. See year. Also, see instr	ess and you did no instructions if you ructions for rules	t dispose of stock received more the for reporting a no	during the tax yea nan one distribution	r,		0
f	Enter gain or loss from	n the disposition of	stock of a sectio	n 1291 fund or f	ormer section 129	1		
	fund. If a gain, complete							568
11a	Att it is to to some out	for each distribution block of shares	on and disposition held. Allocate the	on. Show your e excess distribut	holding period for	or Sign	SEE	STATEMENT
b	Enter the total of the		•	-		ar l		7. 根据
	and tax years before amounts on your incom	the foreign corpora ne tax return as othe	ition became a F	PFIC (pre-PFIC tax	years). Enter thes	e 11b		568
C	Enter the aggregate i	ncreases in tax (be	fore credits) for	each tax year in	your holding perio	d		
	(other than the current	tax year and pre-PF	(See insti	ructions.)		. 11c		
d	Foreign tax credit. (See	e instructions.)				. 11d	22222	
е	Subtract line 11d from							
	tax." (See instructions.)					. 11e		
f	Determine interest or					nd		
	methods of section 662				- 100			
Par	t V Status of Prior Complete a se	Year Section 12 parate column for tion of the section	294 Elections a or each outstar	ind Termination ding election.	n of Section 12	94 Elect	tions 0 only	if there is a
-		(i)	(ii)	(iii)	(iv)	(v)		(vi)
1	Tax year of outstanding	ASSESSMENT AND AND ASSESSMENT OF THE PARTY O						
•	election							
2	Undistributed earnings to							
-	which the election relates							
	Wilder the election related							
3	Deferred tax	1			,			
	Interest accrued on deferred							
•	tax (line 3) as of the filing date							
	tax (line 3) as of the lining date	77-94-77 - 97 - W.L. H W.						
=	Event terminating election							
5	Event terminating election							
	Earnings distributed or deemed							
	distributed during the tax year							
	Deferred tax due with this							
	return							
	Accrued interest due with				1			
	this return	The state of the s	pawisan tarah an iking ata				ACTURAL AC	SHESSURA MUNICIPAL
9	Deferred tax outstanding after							
	partial termination of election							
10	Interest accrued after partial		-					1
//	termination of election							

FORM 8621 SUPPORTING SCHEDULES

NAME OF PFIC OR OEF:

TOREX GOLD RESOURCES INC.

PART IV, LINE 11A - DIST AND DISP OF STOCK IN SECTION 1291 FUND

DESCRIPTION	ACQUIRED SOLD	AMOUNT
SECTION 1291 STOCK SECTION 1291 STOCK SECTION 1291 STOCK	02/12/2010 04/26/2010 02/12/2010 04/26/2010 02/12/2010 04/27/2010	82. 70. 416.
	TOTAL	568.

Form 8621
(Rev. December 2004)
Department of the Treasury

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

OMB No. 1545-1002

Attachment Sequence No. 69

epartme	nt of the Treasury evenue Service		➤ See separa	te instructions.		Sequence No. 69	
	shareholder				identifying number (s	see page 2 of instructions)	
	ANAPOLIS MU	SEUM OF ART	r, INC.		35-086795	5	
T TA TO T	street, and room or suite no	o. (If a P.O. box, see page	2 of instructions.)		Shareholder tax year, cale	endar year or other tax	year
	MICHIGAN F		1.5		beginning 07/01/	/2010 _{and ending} 06/30/2	2011
	own, state, and ZIP code or						
		IN	46208				
	IANAPOLIS		dual X Corporation	Partnership	S Corporation	Nongrantor Trust E	Estate
Check I	type of shareholder filing passive foreign investment				Employer Identificati		
					FOREIGNUS		
FRAI	NCO-NEVADA C	ORPORATION				und: calendar year 2010_ o	or other
	(Enter number, street, city		740 M	5X 1E4	Tax year of company or n	und: calelidal year = = = = 0	1 Outes
	KING STREET		740	NY ID4		and	
	ОТИС	CA			ending		
Part	Elections (See	e instructions.)					
				S	DEIC on a OFF Co	malata lines 1e through 2c of l	Part II
A	Election To Treat th	ne PFIC as a QEF. I,	a shareholder of a PFIC	c, elect to treat the	PFIC as a QEF.Co	mplete lines 1a through 2c of l	
в	Deemed Sale Elect	tion. I, a shareholde	r on the first day of a P	FIC's first tax year	as a QEF, elect to	recognize gain on the dee	sineu
	sale of my interest i	in the PFIC. <i>Enter ga</i>	ain or loss on line 10t of	Paπ IV.			
c 🗌	Deemed Dividend	Election. I, a share	eholder on the first da	y of a PFIC's firs	t tax year as a Q	EF that is a controlled for	reign
	corporation (CFC).	elect to treat an an	nount equal to my sna	re of the post-198	so earnings and p	profits of the CFC as an ex	^೧೮೨೨
	distribution. Enter to	his amount on line 1	Ue of Part IV.				
D C	Election To Extend	d Time For Paymer	nt of Tax. I, a shareho	ider of a QEF, ele	ect to extend the t	ime for payment of tax of	n the
	undistributed earni	ngs and profits of the	ne Qefuntii this electio	n is terminated. C	Joinpiete inies sa t	mough 40 or rait into our	
	the tax that may be	n of line 1a or line	2a of Part II is inclu	dible under section	n 551 or 951, yo	ou may not make this ele	ction.
	Alex secondians 1	(204/a) and 1204/f)	and the related regulati	ons for events tha	i lemminale uns ere	CHOH.	
E	7		and Colo of DEIC I o	chareholder of a	former PEICOLA	PFIC to which section 123	97(e)
	my share of the P	FIC's post-1986 ear	nings and profits deeff	ned distributed, or	ine last day of it	s last tax year as a PFIC	uridei
	section 1297(a). Ei	nter gain on line 10f of	<i>Paπ IV.</i> ok I a shareholder of	a PEIC elect to	mark-to-market the	PFIC stock that is market	etable
F	Within the meaning	of section 1296(e).	Complete Part III.	4 1 1 10 10 10 10			
Do. 4	I Income Eren	o Ouglified El	lecting Fund (OFF	All OFF sharehol	ders complete lines	1a through 2c. If you are n	naking
Part	Income From	molete lines 3a through	h 4c. (See page 5 of instr	uctions.)			
				1 . 1			
1a	Enter your pro rata shar	re of the ordinary eami	ings of the QEF	•			
			cluded in income unde				
	section 551 or 951 or t	that may be excluded t	under section 1293(g)			1c	
			ent on your tax return as di			3928	
2a	Enter your pro rata sha	re of the total net capit	al gain of the QEF	. 2a			
b			cluded in income unde				
	section 551 or 951 or 1	that may be excluded (under section 1293(g)	. 2b		Mark Control	
С	Subtract line 2b from	m line 2a. This am	nount is a net long-ten	n capital gain. Er	nter this amount	20	
	in Part II of the Schedu	le D used for your inco	me tax return. (See instruc	tions.)		2c	
3a	Add lines 1c and 2c					3a	
b	Enter the total amoun	nt of cash and the f	fair market value of othe	r	7.9		
-			d to you during the ta				
С	Enter the portion of	line 3a not already in	ncluded in line 3b that i	s			
•			u disposed of, pledged, o			(0.08)	
						3d	
	Add lines 3b and 3c	ine 3a and enter the d	ifference (if zero or less, e	nter amount in brack	ets)	3e	00 10-151
е						Anine	
	Important: If line 3e	is greater than zer	o, and no portion of lin	e la orza is inc	iddible III II/COINE		
			ection D with respect to the				
			ctions.)				
b			ermined without regard f				
	the amount entered or	n line 3e		4b			
C	Subtract line 4b from	om line 4a. This i s	s the deferred tax, th	e time for paym	ent of which is	4.	
	extended by making	Election D. See instru	ctions			4c	

•							rage a
om 86	21 (Rev. 12-2004)	m Mark-to-Mark	et Election (Se	e page 5 of ins	structions.)	5	
Part	Gain or (Loss) From Enter the fair market value of	Evour PEIC stock at	the end of the tax y	/ear		6	
5	Enter the fair market value o Enter your adjusted basis in	the stock at the end	of the tax year			•	
6	Enter your adjusted basis in Excess. Subtract line 6 from		on here. Include th	is amount as ordin	ary income	1 - 1	
7	Excess. Subtract line 6 from	- to line 9	op note:			7	
	on your tax return. If a loss, Enter any unreversed inclus			a memiciona.		8	
8	Enter any unreversed inclus Enter the smaller of line 7 or	sions (as delined in s	amount as an ordin	ary loss on your ta	x return	9 Cofine	tructions)
9	Enter the smaller of line 7 or	r line 8. Include this t	ons of Stock of	f a Section 129	1 Fund (See pa	age 6 of Insi	(Iuctions.)
Part	IV Distributions From Complete a separ	m and Disposition	ch excess disti	ibution (see ins	structions).		
	Complete a sepai	ater art iv ior ou	and the state of	the current tay ve	ar with respect to		0.
10a	Complete a separ Enter your total distribution	is from the section	1291 lulia adiling	he current tax yea	r, see instructions	10a	
	" IIblo ctock it the	HORDING Deliga of a			1 1 AVANCE	1	
	Enter the total distribution distributions but not include the applicable	uded in income ur stock for each of	the 3 years pre	I(a)(1)(B)) made ceding the curre courrent tax year	nt tax year (or if	10b	
	shorter, the portion of the	Stratefloider 5 ficiality	oher of preceding t	ax years is less tha	an 3.)	10c	
C	shorter, the portion of the Divide line 10b by 3. (See i	Instructions if the ridi				10d	
d	Marie 10c by 125% (1.2	(5).		to the evenous	distribution With		
	Multiply line 10c by 125% (1.2 Subtract line 10d from line respect to the applicable do not complete the rest during the current tax ye on your income tax return	t of Part IV. See instar Also, see instruc	structions if you retions for rules for	reporting a none	excess distribution	10e	0.
	on your income tax return		to all of a coction	1291 fund or for	mer section 1291	10f	37 <u>5</u> .
f	Enter gain or loss from fund. If a gain, complete	line 11 If a loss, sho	w it in brackets an	d do not complete	line 11	The second secon	14-16-16-16-16-16-16-16-16-16-16-16-16-16-
	fund. If a gain, complete I Attach a statement fo	r each distribution	and disposition	. Show your h	olding period ioi	GEF	STATEMENT
11a	each share of stock of	all amounts that are	allocated to days	in each tax year.	o current tay year	表記答為	
ı	. Enter the total of the all	mounts determined	III III C TTG CIGO	IC (pro PEIC tax	years). Enter these	11b	375.
	and tay veats belote u	ie ioroidii aark					
	amounts on your income		- andital for a	ach tax vear in V	our holding period	'	
	c Enter the aggregate inc (other than the current to	ov year and pre-PFIC	vears). (See instru	ctions.)		11d	
	(other than the current to d Foreign tax credit. (See i	instructions)				: 110	
	 Subtract line 11d from tax." (See instructions.) 	I little 116. Ento: 2				. 11e	
	tax." (See instructions.) f Determine interest on		in tax determine	d on line 11e u	ising the rates and	d	
	f Determine interest on	each liet literase	ate amount of inter	est here. (See inst	ructions.)	. 11f	
	f Determine interest on methods of section 662	Year Section 12	94 Flections a	nd Termination	n of Section 129	ond 10 o	nly if there is a
P	art V Status of Prior	rear Section 12	r each outstan	ding election.	Complete lines :	g and 10 0	iny il thoro io a
	Complete a sel	ion of the section	1294 election)			(vi)
	рапіаі іептіпац		(ii)	(iii)	(iv)	(v)	
		(i)	()				
•	Tax year of outstanding						
	election						
	2 Undistributed earnings to						
	which the election relates						
	3 Deferred tax						
	4 Interest accrued on deferred		l				
	tax (line 3) as of the filing date						
	5 Event terminating election						
	6 Earnings distributed or deemed						
	distributed during the tax year						
	7 Deferred tax due with this						
	return		+				
	8 Accrued interest due with						
	this return		(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)				
	9 Deferred tax outstanding after	A STATE OF THE PARTY OF THE PAR		1			
	partial termination of election			+			
	10 Interest accrued after partia						
	termination of election • •						orm 8621 (Rev. 12-2004)
	COLUMN						

NAME OF PFIC OR OEF:

FRANCO-NEVADA CORPORATION

PART IV, LINE 11A - DIST AND DISP OF STOCK IN SECTION 1291 FUND

PART IV, LINE TIA - DIST AND	ACQUIRED SOLD	AMOUNT
DESCRIPTION SECTION 1291 STOCK SECTION 1291 STOCK	03/25/2010 04/06/2010 03/25/2010 04/09/2010 03/25/2010 04/09/2010	188. 132. 55.
SECTION 1291 STOCK	TOTAL =	375.

Form **8621** (Rev. December 2004)

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

Department of the Internal Revenu	he Treasury le Service		➤ See separate	instri	uctions.			Sequence No. 69	
Name of shar						ldentifylng numbe	r (see page	2 of instructions)	
		SEUM OF ART, INC				35-0867955			
Number, stree	et, and room or suite no	. (If a P.O. box, see page 2 of instructi	ons.)			Shareholder tax year:	calendar year	or other tax year	
4000 N	MICHIGAN R	OAD				beginning 07/0	1/2010	and ending 06/30/2011	
City or town,	state, and ZIP code or	country							
INDIAN	NAPOLIS	IN 46208							
	of shareholder filing			Part	nership	S Corporation		grantor Trust Estate	
Name of pass	sive foreign investment	company (PFIC) or qualified electing for	und (QEF)			Employer Identific	ation numb	er(if any)	
LAKE S	SHORE GOLD	CORP				FOREIGNU			
Address (Ente	er number, street, city o	r town, and country.)				Tax year of company of	or fund; calenda	ar year <u>2010</u> _ or other	
181 UN	NIVERSITY	AVE, SUITE 2000	M5	1E H	M7	tax year beginning		and	
TORON?		CA				ending		· · · · · · · · · · · · · · · · · · ·	
Part I	<u> Elections (See</u>	instructions.)							
B Dee sal C De cor dis D Ele und the No Als	emed Sale Elective of my interest in emed Dividend reporation (CFC), estribution. Enter the ection To Extend distributed earning tax that may be extended in the extended in t	e PFIC as a QEF. I, a shareholder on the find the PFIC. Enter gain or loss of the the transfer of the QEF unit of the	rst day of a PFI on line 10f of P on the first day al to my share IV. I, a shareholded til this election art II is includibulated regulation of PFIC. I, a shareholded	IC's first Part IV. of a lie of the er of a is term ble unas for en erebonareho	et tax year a PFIC's first e post-1986 a QEF, elect ninated. Co der section events that it	tax year as a searnings and to extend the implete lines 3a searninate this external th	QEF that profits of time for through you may lection.	is a controlled foreign the CFC as an excess payment of tax on the 4c of Part II to calculate not make this election. which section 1297(e)	
my sec F Ele wit	share of the PF ction 1297(a). Entection To Mark-to thin the meaning Income From	IC's post-1986 earnings and er gain on line 10f of Part IV. -Market PFIC Stock. I, a shof section 1296(e). Complete a Qualified Electing Final policy in the section 1296 (c). (See papers of the section 1296 (c).	profits deemed hareholder of a hart III. und (QEF).	d distr	ibuted, on ,elect to m	the last day of ark-to-market the	its last ta	ex year as a PFIC under stock that is marketable	
		of the ordinary earnings of the C		1a		- to the second	10000		
	•	line 1a that is included in							
	· · · · · · · · · · · · · · · · · · ·	at may be excluded under section		1b			CADE		
		e 1a. Enter this amount on your t			come		1c		
		of the total net capital gain of the		2a					
	•	line 2a that is included in					正在		
		at may be excluded under sectio		2b					
		line 2a. This amount is a			gain. Ente	r this amount			
		D used for your income tax retur					2c		
3a Add	lines 1c and 2c						3a		
		of cash and the fair market					1000		
ргоре	erty distributed or	deemed distributed to you of	luring the tax				1200		
year	of the QEF.(See ins	tructions.)		3b			1600		
c Enter	r the portion of lin	e 3a not already included in 1	ine 3b that is	,					
attrib	outable to shares i	n the QEF that you disposed o	of, pledged, or				200		
other	rwise transferred du	ring the tax year		3c			18/45		
d Add	lines 3b and 3c .						3d		
e Subti	ract line 3d from lin	e 3a, and enter the difference (if	zero or less, ente	r amou	nt in brackets	s)	3e		
unde	er section 551 or 95	is greater than zero, and no 1, you may make Election D with	respect to the ar	nount c		lible in income	95 V		
4a Ente	r the total tax for the	tax year (See instructions.)		4a			表示 意		
		the tax year determined with					19-11-1		
		ine 3e		4b					
		line 4a. This is the defe					1.		
exter	nded by making Eig	ection D. See Instructions					4c		

	8621 (Rev. 12-2004)							Page 2
Par	Gain or (Loss)							
5	Enter the fair market val	lue of your PFIC stoc	k at the end of the	tax year				
6	Enter your adjusted bas					. 6		
7	Excess. Subtract line 6	from line 5. If a gain,	stop here. Includ	le this amount as o	ordinary income			
	on your tax return. If a lo					. 7		
8	Enter any unreversed in	clusions (as defined	in section 1296(d))	. See instructions.		1 -		
9	Enter the smaller of line					. 9		
Par		rom and Dispos					of insf	tructions.)
		paratePart IV for						
10a	Enter your total distribu					$\overline{}$		
IVa	the applicable stock. If							0
h								<u>~</u>
b	Enter the total distributions but not in respect to the application shorter, the portion of the state of the	included in income able stock for each the shareholder's hol	under section 1: of the 3 years ding period before	291(a)(1)(B)) made preceding the cu the current tax ye	le by the fund with rrent tax year (or ear)	if 10b		
С	Divide line 10b by 3. (Se	ee instructions if the r	number of precedin	g tax years is less	than 3.)	. 10c		
d	Multiply line 10c by 125% ((1.25).				. 10d		
е	Subtract line 10d from respect to the applicabl do not complete the riduring the current tax on your income tax retu	e stock. If zero or le est of Part IV. See year. Also, see instr	ess and you did no instructions if you ructions for rules	t dispose of stock received more t for reporting a no	during the tax year than one distribution onexcess distribution	;		0
f	Enter gain or loss from							
•	fund. If a gain, complete							19
11a	Attach a statement each share of stock or your holding period. Ac	for each distribution or block of shares	on and disposition held. Allocate the	on. Show your e excess distribut	holding period fo	T PARTY	SEE	STATEMENT
b	Enter the total of the			•		r see	ASES!	
_	and tax years before amounts on your incom	the foreign corpora ne tax return as othe	ition became a F	PFIC (pre-PFIC tax	years). Enter thes	e 11b		19
C	Enter the aggregate in	ncreases in tax (be	fore credits) for	each tax year in	your holding period	t l		
	(other than the current	tax year and pre-PF	Cyears). (See instr	ructions.)		. 11c		
d	Foreign tax credit. (See	e instructions.)				. 11d		
е	Subtract line 11d from	m line 11c. Enter	this amount on y	our income tax	retum as "additiona	1		
	tax." (See instructions.)					. 11e		
f		each net increase	in tax determine	ed on line 11e	using the rates an	d		
	methods of section 662				7207			
Par		Year Section 12					ions	
	Complete a se	parate column fo	or each outstar	nding election.				y if there is a
	partial terminat	ion of the section	n 1294 electioi	7.				
		(i)	(ii)	(iii)	(iv)	(v)		(vi)
1	Tax year of outstanding							
	election							
2	Undistributed earnings to							
	which the election relates							January Konstitution (Constitution Constitution Constitut
3	Deferred tax							
	Interest accrued on deferred							
	tax (line 3) as of the filing date							
	,							L (- 1 - 2 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1
5	Event terminating election							
	Earnings distributed or deemed							
J	distributed during the tax year							
7	Deferred tax due with this							1
1								
	return							
8	Accrued interest due with							
_	this return	territoristic material	e te Baylet I sale occurs			ale vision of		LEAST OF THE SAME
9	Deferred tax outstanding after							
	partial termination of election							
10	Interest accrued after partial							
	termination of election	3						

NAME	OF	PFIC	OR_	OEF:
------	----	------	-----	------

LAKE SHORE GOLD CORP

PART IV, LINE 11A - DIST AND DISP OF STOCK IN SECTION 1291 FUND

DESCRIPTION	ACQUIRED SOLD	AMOUNT
SECTION 1291 STOCK SECTION 1291 STOCK SECTION 1291 STOCK	05/21/2010 06/25/2010 05/25/2010 06/25/2010 05/21/2010 06/28/2010	11. 3. 5.
	TOTAL	19.

Form **8621**(Rev. December 2004)
Department of the Treasury

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

OMB No. 1545-1002

Attachment Sequence No. 69

	ent of the Treasury Revenue Service	▶ See s	eparate instructio	ns.		Sequence No. 69
	of shareholder			identifying number	(see pag	e 2 of Instructions)
IND	IANAPOLIS MU	SEUM OF ART, INC.	35-08679	55		
Number	r, street, and room or suite no	o. (If a P.O. box, see page 2 of instructions.)	Shareholder tax year. ca	alendar yea	ar or other tax year	
	0 MICHIGAN R			beginning 07/01	/201	0 _{and ending} 06/30/2011
	town, state, and ZIP code or					
•	IANAPOLIS	IN 46208				
	type of shareholder filing		ion Partnersh	nip S Corporation	☐ No	ongrantor Trust Estate
Name o	of passive foreign investment	company (PFIC) or qualified electing fund (QEF)		Employer Identifica		
	ABASCA OIL S			FOREIGNU	5	
	s (Enter number, street, city of		****			ndar year 2010_ or other
		SW, STE 2000	T2P 3H7	tax year beginning		
	GARY	CA			V	
	I Elections (See				=	
гаг	Liections (occ	moduciono.			12,500	
	Flootion To Troot th	e PFIC as a QEF. I, a shareholder of a	PEIC elect to tre	at the PFIC as a QEF.C	omolete	lines 1a through 2c of Part II.
^ ⊢		ion. I, a shareholder on the first day of				
в [Deemed Sale Elect	n the PFIC. <i>Enter gain or loss</i> on line 1	of a Filosilist (a)	your as a well toler to	coog	gain on the doonloa
		Election. I, a shareholder on the fir		''s first tay vear as a ()FF the	at is a controlled foreign
с 🗀	J Deemed Dividend	election. I, a snareholder on the majority and the majori	v share of the po	st-1986 earnings and	profits	of the CFC as an excess
	distribution. Enter th	his amount on line 10e of Part IV.	,		•	
<u>. –</u>	Sleetien To Extend	Time For Payment of Tax a sha	areholder of a OF	F. elect to extend the	time fo	or payment of tax on the
D	undistributed earnir	ngs and profits of the QEFuntil this e	election is terminal	ted. Complete lines 3a	through	4c of Part II to calculate
	the tay that may be	deferred				
	Note: If any portion	of line 1a or line 2a of Part II is 294(c) and 1294(f) and the related re	includible under	SECTION 337 OF 931, y	ou ma _. ection	у пот таке тіз еїестоп.
	Also, see sections 1	294(c) and 1294(f) and the related re nize Gain on Deemed Sale of PFIC	yuialions ioi even La shareholder	of a former PFIC or a	PFIC t	o which section 1297(e)
E L	applies plact to trac	at ac an excess distribution, the dain	recognized on the	e deemed sale of my in	terest 1	n the PFIC. or. it I quality.
	my share of the PF	FIC's post-1986 earnings and profits	deemed distribute	ed, on the last day of i	ts last	tax year as a PFIC under
	section 1297(a) En	ter gain on line 10f of Part IV.				
F L	_ ⊨lection To Mark-to	o-Market PFIC Stock. I, a sharehold of section 1296(e). Complete Part III		or to main-to-mainer in	J 1 1 10	TOTAL IS MAINCADIO
В.				archaldors complete lines	1a the	ough 2c If you are making
Part	Income From	n a Qualified Electing Fund (omplete lines 3a through 4c. (See page 5 or	www.p. All UEFS⊓ finetrictions\	arenolders complete lines	ıa ull	ough 20. If you are making
			1 . 1			
1a	Enter your pro rata share	e of the ordinary earnings of the QEF	· · · · la			
b		line 1a that is included in income				
		nat may be excluded under section 1293(g			1c	
		e 1a. Enter this amount on your tax return		· · · · · · · · · · · · · · · · · · ·	20000	
		e of the total net capital gain of the QEF.				
b		line 2a that is included in income				
		nat may be excluded under section 1293(g		in Catao Abia		
C		n line 2a. This amount is a net lor			2c	
		e D used for your income tax return. (See i			3a	
3a					Jd	
b		t of cash and the fair market value of		3		
		r deemed distributed to you during the	1 1			
		structions.)				
С		ne 3a not already included in line 3b				
		in the QEF that you disposed of, pledg			Maria de	
		uring the tax year				
d					3d	
е		ne 3a, and enter the difference (if zero or le			3e	
		is greater than zero, and no portion				
		51, you may make Election D with respect	to the amount on lin		発力を	
4a	Enter the total tax for the	e tax year (See instructions.)	4a		智慧	
b	Enter the total tax fo	r the tax year determined without reg	ard to		所容便	
	the amount entered on	line 3e	4b		480	
С		m line 4a. This is the deferred tax		payment of which is		
		lection D. See Instructions			4c	

ADDITIONAL INFORMATION REQUIRED TO BE ATTACHED TO FORM 8621, LINE 11a - HOLDING PERIOD OF STOCK

THE PARTNERSHIP HAS MADE CERTAIN INVESTMENTS IN PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICS") THAT ARE SUBJECT TO IRC SECTION 1291 ("SECTION 1291 FUNDS"). ALTHOUGH YOUR ALLOCABLE SHARE OF SUCH 1291 FUND INCOME IS ALREADY INCLUDED WITHIN YOUR SCHEDULE K-1, YOU MAY BE REQUIRED TO FILE IRS FORM 8621 TO REPORT YOUR INDIRECT INTEREST IN SUCH SECTION 1291 FUNDS. INCLUDED IS THE INFORMATION NECESSARY TO COMPLETE THE FORM.

THE TAX RULES RELATING TO PFIC INVESTMENTS ARE COMPLEX AND YOU ARE ADVISED TO CONSULT WITH YOUR TAX ADVISOR.

PFIC NAME:

ATHABASCA OIL SANDS CORP.

PFIC ADDRESS:

BOW VALLEY SQUARE 4

SUITE 2000

250 6TH AVENUE SW

CALGARY, ALBERTA, CANADA T2P 3H7

EIN:

N/A

TAX YEAR:

1/1/10 - 12/31/10

			TOTAL GAIN OR LOSS FROM	EXCESS DISTRIBUTION
		NUMBER OF	THE DISPOSITION OF STOCK	ALLOCABLE TO
DATE	DATE	DAYS HELD	OF A SECTION 1291 FUND	CURRENT YEAR
ACQUIRED	SOLD	LINE 11a	LINE 10f	<u>LINE 11b</u>
6/10/2010	6/17/2010	8	9	9
6/10/2010	6/18/2010	9	54	54
6/10/2010	6/21/2010	12	117	117
6/10/2010	6/21/2010	12	49	49
6/14/2010	6/21/2010	8	29	29
6/15/2010	6/21/2010	7	53	53
6/14/2010	6/22/2010	9	6	6
6/14/2010	7/8/2010	25	2 5	25
10/1/2010	10/27/2010	27	6	6
		TOTAL	348	<u>348</u>

Form (8621 (Rev. 12-2004)							Page 2
Par	Gain or (Loss)	From Mark-to-M	arket Election	(See page 5 or	f instructions.)			
5	Enter the fair market val	ue of your PFIC stock	k at the end of the	tax year		5		
6	Enter your adjusted basi	is in the stock at the	end of the tax year			6		
7	Excess. Subtract line 6 f	from line 5. If a gain,	stop here. includ	e this amount as o	ordinary income			
•	on your tax return. If a lo					7		
8	Enter any unreversed in					1 0		
9	Enter the smaller of line	7 or line 8. Include th	nis amount as an o	rdinary loss on you	ır tax return			
	IV Distributions F	rom and Dispos	itions of Stock	of a Section	1291 Fund (See	page 6	of inst	ructions.)
r ai	Complete a ser	paratePart IV for	each excess d	istribution (see	instructions).	J		
40-	Enter your total distribu			19.00				
10a	the applicable stock. If	the holding period o	f the stock began	in the current tax	vear see instructions	10a		0
	the applicable stock. If	the holding period o	the sections of	auch distribution	that were excess			<u>_</u>
b	Enter the total distributions but not i respect to the applica shorter, the portion of the state	utions (reduced by ncluded in income ble stock for each he shareholder's hol	under section 12 of the 3 years ding period before	291(a)(1)(B)) made preceding the cut the current tax years.	de by the fund with irrent tax year (or if ear)	10b		
c	Divide line 10b by 3. (Se	ee instructions if the r	number of precedin	g tax years is less	than 3.)	10c		
d						10d		
	Subtract line 10d from respect to the applicabl do not complete the reduring the current tax	line 10a. This amo e stock. If zero or le est of Part IV. See	ount, if more than ess and you did no instructions if you	zero, is the exc t dispose of stock received more t	ess distribution with during the tax year, than one distribution			
	on your income tax retu					10e	20023200	0
f	Enter gain or loss from	n the disposition of	stock of a section	n 1291 fund or	former section 1291			
•	fund. If a gain, complete					10f		348
11a	A41 1 .4.4	for each distribution block of shares	on and disposition held. Allocate the	on. Show your e excess distribut	holding period for tion to each day in	2次4分 16年以 18年以	SEE	STATEMENT
b	Enter the total of the	amounts determined	in line 11a that	are allocable to	the current tax year		新疆	为人。131 dec
	and tax years before	the foreign corpora	ition became a F			11b	Name and Address of the Owner, where the Owner, which is the Owner, where the Owner, which is the	348
	amounts on your incom	ne tax return as otne	r income			_		340
С	Enter the aggregate in	ncreases in tax (be	fore credits) for (each tax year in	your notating period			
	(other than the current	tax year and pre-PF	IC years). (See insti	ructions.)				
d	Foreign tax credit. (See							
е	Subtract line 11d from	m line 11c. Enter	this amount on y	our income tax	return as "additional			
	tax." (See instructions.)					11e		
f	Determine interest on	n each net increase	in tax determine	ed on line 11e	using the rates and			
	methods of section 662	21. Enter the aggreg	ate amount of inte	rest here. (See in:	structions.)	11f	1-20-1	
Pai	t V Status of Prior	Year Section 12	294 Elections a	and Termination	on of Section 129	4 Elect	tions	
	Complete a se	parate column fo	or each outstar	nding election.	Complete lines 9	and 1	'0 only	if there is a
	partial terminat	ion of the section	n 1294 electioi	n.				
_		(i)	(ii)	(iii)	(iv)	(v)		(vi)
1	Tax year of outstanding		, ,					
•	election				-			
-	Undistributed earnings to							
_	- 1							
	which the election relates				 			
_								
3	Deferred tax				 	10000		
4	Interest accrued on deferred							
	tax (line 3) as of the filing date							
		ř.						
5	Event terminating election				<u> </u>			
6	Earnings distributed or deemed							
	distributed during the tax year				-			
7	Deferred tax due with this							
	return							
8	Accrued interest due with				No.			
-	this return							
9	Deferred tax outstanding after		ALL SECURITION OF THE PARTY OF	PARTICIPATION OF THE PARTY	n katalogudaksi Manasaksi	NEW TOWN	30-4-5	CHARLEST CONTRACTOR
-	partial termination of election	1		1				
40	•							
10	Interest accrued after partial	8	1					
	termination of election	I .	1	4 0 000				

FORM 8621 SUPPORTING SCHEDULES

NAME OF PFIC OR OEF:

ATHABASCA OIL SANDS CORP

PART IV, LINE 11A - DIST AND	DISP OF STOCK IN	SECTION	1291 FUND
DESCRIPTION	ACQUIRED	SOLD	AMOUNT
SEE ATTACHMENT	VAR	VAR	348.
	TOTAL		348.

Form **8621** (Rev. December 2004)

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

OMB No. 1545-1002

	ent of the Treasury Revenue Service	► See separat	e instructions.		Sequence No. 69
	of shareholder			Identifying number (see p	age 2 of instructions)
IND	IANAPOLIS MU	SEUM OF ART, INC.		35-0867955	
		o. (If a P.O. box, see page 2 of instructions.)		Shareholder tax year: caiendar	year or other tax year
400	0 MICHIGAN R	OAD		beginning 07/01/20	10 and ending 06/30/2011
City or	town, state, and ZIP code or	country			
IND	IANAPOLIS	IN 46208			
Check	type of shareholder filing	the return: Individual X Corporation	Partnership		Nongrantor Trust Estate
Name o	of passive foreign investment	company (PFIC) or qualified electing fund (QEF)		Employer identification n	umber(if any)
	TT RESOURCES			FOREIGNUS	
	s (Enter number, street, city of			Tax year of company or fund: o	alendar year 2 0 1 0 _ or other
			5B 1N2	tax year beginning	and
	COUVER	CA		ending	•
Part	I Elections (See	instructions.)			
_	,	PEIO		DEIC OFF C	to lines de thereigh 2s of Bort II
А В С	Deemed Sale Elect sale of my interest in	te PFIC as a QEF. I, a shareholder of a PFIC tion. I, a shareholder on the first day of a PFIC the PFIC. Enter gain or loss on line 10f of FIC tection. I, a shareholder on the first day	FIC's first tax year Part IV.	as a QEF, elect to rec	ognize gain on the deemed
С <u> </u>	corporation (CFC), distribution. Enter th	elect to treat an amount equal to my shannis amount on line 10e of Part IV.	e of the post-198	6 earnings and profit	s of the CFC as an excess
D	undistributed earnir the tax that may be Note: If any portion	n of line 1a or line 2a of Part II is includi	ı is terminated. <i>C</i> ible <i>under sectio</i>	omplete lines 3a throu n 551 or 951, you n	igh 4c of Part II to calculate nay not make this election.
	Also, see sections 1.	294(c) and 1294(f) and the related regulation	ons for events that	terminate this election	7.
E	_ Election To Recogn	nize Gain on Deemed Sale of PFIC. I, a sat as an excess distribution the gain recogn	shareholder of a f	former PFIC or a PFIC	to which section 1297(e) t in the PFIC or if Louglify
	my share of the PF	at as an excess distribution, the gain recognition of the same second and profits deems	ed distributed, on	the last day of its la	st tax year as a PFIC under
	section 1297(a). En	nter gain on line 10f of Part IV.			
F	☐ Election To Mark-to	o-Market PFIC Stock. I, a shareholder of of section 1296(e). Complete Part III.	a PFIC, elect to 1	nark-to-market the Pr	TO Stock that is marketable
Dox		a Qualified Electing Fund (QEF).	All OFF sharehold	lors complete lines 1a	through 2c. If you are making
rai		mplete lines 3a through 4c. (See page 5 of instruc		iers complete lines ra	anough 20. If you are making
1a		e of the ordinary earnings of the QEF	1 . 1	100	
b	Enter the portion of	line 1a that is included in income under			
	· ·	nat may be excluded under section 1293(g)	1b		
С		ne 1a. Enter this amount on your tax return as divi		1c	
		e of the total net capital gain of the QEF		600 是	
		line 2a that is included in income under		St. Ac.	
	section 551 or 951 or th	hat may be excluded under section 1293(g)	2b	(Line	
C	Subtract line 2b from	n line 2a. This amount is a net long-term	capital gain. Ent	ter this amount	
	in Part II of the Schedule	e D used for your income tax return. (See instruction	ons.)		
3a				3a	
þ		t of cash and the fair market value of other	1 1		
	, , ,	r deemed distributed to you during the tax	l 1		
		structions.)			
С	-	ne 3a not already included in line 3b that is	I I	realth.	
		in the QEF that you disposed of, pledged, or	1 1	Services.	
		uring the tax year			
	Add lines 3b and 3c	ne 3a, and enter the difference (if zero or less, ent	er amount in bracks		
е				Programme and the second	
		is greater than zero, and no portion of line 51, you may make Election D with respect to the a		Jaible III IIICOME	
A2		e tax year (See instructions.)	I . I		
		or the tax year determined without regard to	•		
		line 3e		No.	
c	Subtract line 4b from	m line 4a. This is the deferred tax, the	•	nt of which is	
•		lection D. See instructions		4c	1

Form 8	621 (Rev. 12-2004)							Page 2
Part	Gain or (Loss)	From Mark-to-M	arket Election	(See page 5 o	f instructions.)			
5	Enter the fair market value	ue of your PFIC stock	at the end of the	tax year		5		
6	Enter your adjusted basi	s in the stock at the e	end of the tax year			6		
7	Excess. Subtract line 6 f	from line 5. If a gain,	stop here. Includ	e this amount as	ordinary income			
	on your tax return. If a lo	ss, go to line 8				7		
8	Enter any unreversed in	clusions (as defined i	n section 1296(d))	See instructions.				
9	Enter the smaller of line	7 or line 8. Include th	is amount as an o	rdinary loss on you	ur tax retum	9		
Part	IV Distributions F	rom and Dispos	itions of Stock	of a Section	1291 Fund (See	page 6	of instr	uctions.)
	Complete a ser	aratePart IV for	each excess d	istribution (see	instructions).			
10a	Enter your total distribut							
iva	the applicable stock. If t	the holding period of	the stock began	in the current tax	year, see instructions	10a		0
b	Enter the total distributions but not in respect to the applica shorter, the portion of the state of the stat	utions (reduced by ncluded in income ble stock for each	the portions of under section 12 of the 3 years	such distribution 291(a)(1)(B)) mad preceding the cu	s that were excess de by the fund with urrent tax year (or i	10b		
	shorter, the portion of the	ne snarenoiders noi	ang penod before	the current tax y	than 2)	10c		
C	Divide line 10b by 3. (Se		iumber of precedin	g tax years is less	tnan 3.)	10d		
d	Multiply line 10c by 125% (1.25).				100		
е	respect to the applicable do not complete the reduring the current tax on your income tax retuined.	e stock. If zero or le est of Part IV. See i year. Also, see instr rn	ss and you did no nstructions if you uctions for rules	t dispose of stock received more for reporting a no	than one distribution onexcess distribution	10e		0
f	Enter gain or loss from	n the disposition of	stock of a sectio	n 1291 fund or	former section 1291			1.40
	fund. If a gain, complete	e line 11. If a loss, sh	now it in brackets	and do not compl	ete line 11	10f	MICHEL AND ADD	143
11a	Attach a statement each share of stock or your holding period. Ad	or block of shares Id all amounts that a	held. Allocate the re allocated to day	e excess distribu /s in each tax yea	tion to each day in r.		THE SERVICE OF THE PARTY OF THE	STATEMENT
	Enter the total of the and tax years before amounts on your incom	the foreign corpora ne tax return as other	tion became a F income	PFIC (pre-PFIC ta:	x years). Enter these	11b		143
С	Enter the aggregate in							
	(other than the current	tax year and pre-PFI	Cyears). (See inst	ructions.)		11c	-	W
d	Foreign tax credit. (See	instructions.)				11d		
е	Subtract line 11d from	m line 11c. Enter t	this amount on y	our income tax	return as "additional		ļ	
	tax." (See instructions.)					11e		
f	Determine interest on	each net increase	in tax determin	ed on line 11e	using the rates and			
	methods of section 662	21. Enter the aggreg	ate amount of inte	erest here. (See in	structions.)	11f		
Par	Status of Prior	Year Section 12	294 Elections a or each outstar	and Termination Ending election.	on of Section 129 Complete lines 9	4 Elect	ions 0 only	if there is a
		(i)	(ii)	(iii)	(iv)	(v)		(vi)
	Tax year of outstanding election							
	Undistributed earnings to which the election relates							
3	Deferred tax							
	Interest accrued on deferred							
	tax (line 3) as of the filing date							
_	Event terminating election							
_					 			
6	Earnings distributed or deemed				1		10	
_	distributed during the tax year				1			
7	Deferred tax due with this				1			1
8	return							
	this return	POTESTAL DE L'ALTERNATION DE	AND ASSESSED FOR	CONTRACTOR OF THE		- PSATE WILLIAM	TO SERVICE AND INC.	NAMES OF THE OWNER OF THE OWNER OF
9	Deferred tax outstanding after							
	partial termination of election				+			
10	Interest accrued after partial		0	1				
_	termination of election · · ·	J	L				<u> </u>	
							Form 86	21 (Rev. 12-2004)

FORM 8621 SUPPORTING SCHEDULES

NAME OF PFIC OR OEF:

BRETT RESOURCES INC

PART IV, LINE 11A - DIST AND DISP OF STOCK IN SECTION 1291 FUND

DESCRIPTION	ACQUIRED SOLD	AMOUNT
SECTION 1291 STOCK SECTION 1291 STOCK SECTION 1291 STOCK	03/22/2010 04/23/2010 03/23/2010 04/23/2010 03/22/2010 04/23/2010	28. 47. 68.
	TOTAL =	143.

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

OMB No. 1545-1002

	ent of the Treasury Revenue Service	Mivestinent o	➤ See separate	instru	ctions.			Sequence No. 69
	f shareholder					Identifying number	(see page	2 of instructions)
		SEUM OF ART, IN	IC.			35-08679	55	
		o. (If a P.O. box, see page 2 of instr				Shareholder tax year. c	alendar vear	or other tax year
400	0 MICHIGAN R	OAD						and ending 06/30/2011
	town, state, and ZIP code or							
-	IANAPOLIS	IN 4620	08					
	type of shareholder filing		Corporation	Partr	nership	S Corporation	☐ Non	ngrantor Trust Estate
Name o	of passive foreign investment	company (PFIC) or qualified electing				Employer identification	ation numl	ber(if any)
TAH	OE RESOURCES	INC.				FOREIGNU	S	
	s (Enter number, street, city of					Tax year of company or	r fund; calend	dar year 2 0 1 0 _ or other
150	0-1055 EST G	EORGIA STREET	V6	E 4N	17	tax year beginning		
VAN	COUVER	CA				ending		
Part	I Elections (See	instructions.)						
A B C C C C C C C C C C C C C C C C C C	Deemed Sale Elect sale of my interest in Deemed Dividend corporation (CFC), distribution. Enter the Election To Extend undistributed earning the tax that may be Note: If any portion Also, see sections 1. Election To Recogn applies, elect to treamy share of the Presection 1297(a). En	e PFIC as a QEF. I, a share ion. I, a shareholder on the the PFIC. Enter gain or lost leect to treat an amount enter amount on line 10e of P Time For Payment of Tags and profits of the QEF deferred. In of line 1a or line 2a of 294(c) and 1294(f) and the nize Gain on Deemed Salet as an excess distribution in CIC's post-1986 earnings atter gain on line 10f of Part IV. o-Market PFIC Stock. I, a	e first day of a PFI as on line 10f of PFI on the first day equal to my share eart IV. IX. I, a shareholde until this election Part II is includible related regulation the of PFIC. I, a shareholde in the gain recogning profits deemed.	C's first lart IV. of a F e of the er of a is term one for e marehol- zed on d distril	PFIC's first post-1986 QEF, election of a found of a f	tax year as a 0 earnings and to extend the implete lines 3a 551 or 951, yearninate this end and sale of my in the last day of	QEF that profits of time for through you may ection. PFIC to the terest in its last to	is a controlled foreign of the CFC as an excess payment of tax on the 4c of Part II to calculate not make this election. which section 1297(e) the PFIC, or, if I qualify, ax year as a PFIC under
	within the meaning	of section 1296(e). Complete a Qualified Electing	ete Part III. Fund (QEF).	All QE				
		mplete lines 3a through 4c. (S		1 . 1			200	
1a	Enter your pro rata share	e of the ordinary earnings of th	e QEF	1a				
þ		line 1a that is included i		1b				
		nat may be excluded under sed e 1a. Enter this amount on yo			ome		1c	
		e 1a. Enter this amount on your of the total net capital gain of		2a	ome		A SECTION AND A	
	- · · · · · · · · · · · · · · · · · · ·	line 2a that is included					1000	
D		nat may be excluded under se		2b				
_		n line 2a. This amount is			gain. Ente	er this amount		
·		e D used for your income tax re					2c	
32							3a	
		t of cash and the fair mark		$[\]$				
-		r deemed distributed to yo						
		structions.)		3b				
С		ne 3a not already included						
		in the QEF that you dispose					999	
		uring the tax year		3c			War a	
d							3d	
е	Subtract line 3d from lin	ne 3a, and enter the difference	(if zero or less, ente	r amour	nt in bracket	s)	3e	
-	Important: If line 3e	is greater than zero, and r	o portion of line	1a or	2a is includ		aliente Misse	
4a	Enter the total tax for the	e tax year (See instructions.)		4a				
Ь		r the tax year determined					(M) (1)	
	the amount entered on	line 3e		4b				
C	Subtract line 4b from	m line 4a. This is the d	eferred tax, the	time f	or payment	t of which is	1.1	
	extended by making E	lection D. See instructions .				<u></u>	4c	

Form 8	8621 (Rev. 12-2004)							Page 2
Par	Gain or (Loss)	From Mark-to-M	arket Election	(See page 5 of	f instructions.)			
5	Enter the fair market val	ue of your PFIC stock	k at the end of the t	tax year				
6	Enter your adjusted bas	is in the stock at the	end of the tax year			6		
7	Excess. Subtract line 6	from line 5. If a gain,	stop here. Includ	le this amount as c	ordinary income	7		
	on your tax return. If a lo	our tax return. If a loss, go to line 8						
8	Enter any unreversed in	nclusions (as defined in section 1296(d)). See instructions.						
9	Enter the smaller of line	7 or line 8. Include the	nis amount as an o	rdinary loss on you	ır tax return	9		
Par	IV Distributions F	rom and Dispos	itions of Stock	of a Section	1291 Fund (See	page 6	of instr	uctions.)
	Complete a ser	paratePart IV for	each excess d	istribution (see	instructions).			
10a	Enter your total distribu	tions from the section	on 1291 fund duri	ng the current tax	year with respect to	1		
	the applicable stock. If	the holding period o	f the stock began	in the current tax	year, see instructions	10a		0
b	Enter the total distributions but not i respect to the applica shorter, the portion of t	utions (reduced by ncluded in income ble stock for each he shareholder's hol	the portions of under section 12 of the 3 years a ding period before	such distributions 291(a)(1)(B)) mad preceding the cu the current tax yo	s that were excess de by the fund with irrent tax year (or i ear)	10b		
С	Divide line 10b by 3. (Se	e instructions if the r	number of precedin	g tax years is less	than 3.)	10c		
d	Multiply line 10c by 125% (1.25).				10d		
е	Subtract line 10d from respect to the applicabl do not complete the reduring the current tax on your income tax retu	e stock. If zero or le est of Part IV. See year. Also, see instr	ess and you did no instructions if you ructions for rules	t dispose of stock received more t for reporting a no	during the tax year, han one distribution onexcess distribution	10e		0
f	Enter gain or loss from	n the disposition of	stock of a section	n 1291 fund or 1	former section 1291		10000	
·	fund. If a gain, complete					10f		102
11a	Attach a statement	for each distribution	on and disposition	on. Show your	holding period for	周期宣传	ELECTIVE S	A STATE OF THE STA
	each share of stock of	or block of shares	held. Allocate the	e excess distribul	tion to each day in	15 A B	SEE :	STATEMENT
L	your holding period. Ac Enter the total of the	amounts that a	re allocated to day	ore allocable to	the current tay vea	Product A Victor		
D	and tax years before	the foreign corpora	ition became a F	PFIC (pre-PFIC tax	years). Enter these	0.00		2年2月1日時
	amounts on your incom	ne tax return as othe	rincome			110		102
C	Enter the aggregate in	ncreases in tax (be	fore credits) for e	each tax year in	your holding period			
	(other than the current							
d	Foreign tax credit. (See	instructions.)				11d		
е	0.11	n line 11c. Enter	this amount on y	our income tax	return as "additiona			
	tax." (See instructions.)					11e		
f	Determine interest on	each net increase	in tax determine	ed on line 11e	using the rates and	i		
	methods of section 662	21. Enter the aggreg	ate amount of inte	rest here. (See ins	structions.)	11f		
Pai	V Status of Prior	Year Section 12	294 Elections a	and Termination	on of Section 129	4 Elect	ions	
	Complete a se	parate column fo	or each outstar	nding election.	Complete lines 9) and 1	0 only	if there is a
100000000	partial terminat	ion of the section	n 1294 electioi	7.		0		
		(i)	(ii)	(iii)	(iv)	(v)		(vi)
1	Tax year of outstanding				-		. 	
	election				ļ			
2	Undistributed earnings to				1			
	which the election relates	579			-			
3	Deferred tax							
4	Interest accrued on deferred							
	tax (line 3) as of the filing date							
		ŀ						
5	Event terminating election							
6	Earnings distributed or deemed	9						
	distributed during the tax year							
7	Deferred tax due with this							
	return							
8	Accrued interest due with							
	this return	Activitating watering benefits				aregus areas		Transfer to the state of
9	Deferred tax outstanding after		The state of the s	1				
	partial termination of election							
10	Interest accrued after partial		20000					
	termination of election · · ·	la control of the con						

FORM 8621 SUPPORTING SCHEDULES

NAME OF PFIC OR OEF:

TAHOE RESOURCES INC.

PART IV, LINE 11A - DIST	AND DISP OF STOCK IN SECTION 12	291 FUND
DESCRIPTION	ACQUIRED SOLD	AMOUNT
SECTION 1291 STOCK	05/28/2010 06/09/2010	102.
	TOTAL	102.

Form **8621**(Rev. December 2004)
Department of the Treasury
Internal Revenue Service

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

OMB No. 1545-1002

Rev. December 2004) Department of the Treasury	▶ See separate i	nstructions.	1 1 2 1 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Sequence (teres)
nternal Revenue Service			Identifying number (see pa	ge 2 of instructions)
Name of shareholder	USEUM OF ART. INC.		35-0867955	
INDIANAPOLIS M	USEUM OF ART, INC. no. (If a P.O. box, see page 2 of instructions.)		Shareholder tax year: calendar ye	ear or other tax year
Number, street, and toom of solic	DOVD		beginning 07/01/201	0 and ending 06/30/2011
4000 MICHIGAN City or town, state, and ZIP code of	n country			
	IN 46208			Iongrantor Trust Estate
INDIANAPOLIS	on the return: Individual X Corporation	Partnership	S Corporation N	iongrantor mast
Check type of shareholder filin	ant company (PFIC) or qualified electing fund (QEF)		1 '	
YOUKU COM INC			FOREIGNUS	alendar year2010_ or other
Address (Enter number, street, cit	ly or town, and country.)		Tax year of company or fund: ca	lendar year = = = = = u outo
11E STNOSTEEL	PLAZA, 8 HAIDIAN DIS 100	080	tax year beginning	and
BEIJING	CH		ending	
Part I Elections (Se	ee instructions.)			
Ture Constant	the PFIC as a QEF. I, a shareholder of a PFIC, of a PFIC as a QEF.		ha DEIC as a OFF Comple	te lines 1a through 2c of Part II.
sale of my interes C Deemed Dividen corporation (CFC distribution. Ente D Election To Exte undistributed eat the tax that may Note: If any por Also, see section: E Election To Rec applies, elect to my share of the section 1297(a). F Election To Mai	ection. I, a shareholder on the first day of a PFIC, of the period of th	of a PFIC's of the post- er of a QEF, is terminated ble under sens for events hareholder of ized on the od distributed.	first tax year as a QEF to 1986 earnings and profit elect to extend the time of the complete lines 3a through the terminate this election for a former PFIC or a PFI deemed sale of my interest, on the last day of its late to mark-to-market the P	that is a controlled foreign is of the CFC as an excess for payment of tax on the ugh 4c of Part II to calculate may not make this election. C to which section 1297(e) in the PFIC, or, if I qualify, ast tax year as a PFIC under FIC stock that is marketable
Election D, also	share of the ordinary earnings of the QEF	1a		
h Enter the nortion	of line 1a that is included in income array	1 . 1		
			10	
- Cubirect line 1h from	m line 1a. Enter this amount on your tax return as divi	inche income		
On Embassions pro rata	share of the total net capital gain of the QEF		#3.0 Phil	
L Cater the nortion	of line 2a that is included in income under	1 1		
			From this amount	
	to the 20 This amount is a net long-term	1 capital gam	1. Elilei lins amount	s
in Part II of the Sch	nedule D used for your income tax return. (See instruct		33	a
n Add Spec 1c and 2				
► Enter the total at	nount of cash and the fair market value of outer			1.3
property distribute	ed or deemed distributed to you during the tax	`		
OFF (S	equinstructions.)	. 05		
c Enter the portion	of line 3a not already included in line 3b that is	, l		
attributable to sh	ares in the QEF that you disposed of, pledged, o	" 3c		150
otherwise transfer	red during the tax year		3	d
d Add lines 3b and 3	3c	nter amount in	brackets)	se
e Subtract line 3d fr	om line 3a, and enter the difference (il Zero di less, ci	12 or 22	is includible in income	4400
under section 551	e 3e is greater than zero, and no portion of lin or 951, you may make Election D with respect to the	1 . 1	e 3e.	
4. Enter the total tax	for the tax year (See instructions.)	• •		
h Enter the total 1	tax for the tax year determined without regard t	10		
			payment of which is	1
	This is the deterred IZX. U	le mine ioi		4c
extended by mal	king Election D. See instructions			Form 8621 (Rev. 12-200

								Page 2
orm 86	21 (Rev. 12-2004)	om Mark-to-Mai	ket Election (S	see page 5 of in	nstructions.)			
Part	Enter the fair market value	of your DEIC stock a	t the end of the tax	vear		5		
		- the stock of the OD	d of the tay vear			6		
6	Excess. Subtract line 6 from	n the Stock at the en	ton here Include:	this amount as ord	linary income	1		
7	Excess. Subtract line 6 from	m line 5. II a yalii, s	NOP Here: molaus		7			
	on your tax return. If a loss	s, go to line o	acetion 1296(d)) 5		8			
8	Enter any unreversed inclu	nreversed inclusions (as defined in section 1200(a))						
9	Enter any unreversed inclusions (as defined in second recommendations). Enter the smaller of line 7 or line 8. Include this amount as an ordinary loss on your tax return 9 Enter the smaller of line 7 or line 8. Include this amount as an ordinary loss on your tax return 9 It IV Distributions From and Dispositions of Stock of a Section 1291 Fund (See page 6 of instructions.)							
Part	Omplete a sepa	om and Disposit	och excess dis	tribution (see il	nstructions).			
200	Complete a cons	TATEPAIL IV IUI G	acii eveess ais	Chiparion Lagar	The second secon			
10a	Enter your total distribution	ons from the section	1291 tuna auling	the current tax Ve	ear see instructions	10a		0.
	the applicable stock. If the	e holding period of t	the stock began in	uch dietributions	that were excess			
b	Enter the total distributions but not increspect to the applicable shorter, the portion of the	ions (reduced by i	inder section 129	1(a)(1)(B)) made	by the fund with			
	respect to the applicable	e stock for each	of the 3 years pr	eceding the curr	ent tax year (or ii	10ь		
	shorter, the portion of the	shareholders holdi	ng penod belole i	terrore in loss th	han 3 \	10c		
С	Divide line 10b by 3. (See	instructions if the nu	imper of preceding	tax years is loos to		10d		
е	Subtract line 10d from I	line 10a. This amou	int, if more than	dispose of stock	during the tax year,			
	respect to the applicable	Stock. If Zelo of les	S and you did not	marined more th	an one distribution			
	do not complete the res during the current tax ye	ear. Also, see instru	ctions for rules for	or reporting a nor	nexcess distribution	10e		0.
	during the current tax ye on your income tax return	1		4004 fund or fo	rmer section 1291			
f	- I loop from	the disposition of	stock of a section	1291 10110 01 10	Miller Scotler 129.	10f	<u></u>	<u> 136</u> .
	fund. If a gain, complete	line 11. If a loss, she	ow it in brackets a	- Show Your	holding period for		A SHADOW	- 特别等的基础
11a							SEE ST.	ATEMENT
h						13407-4 10-11 Albahata		
						11b		<u> 136</u> .
	and tax years before to amounts on your income	e tax return as otner	income	och tay vear in	vour holding period			
C	amounts on your income Enter the aggregate in	creases in tax (bet	ore credits) for e	each tax year in	your moraling passes	11c		
	(other than the current t	ax year and pre-PFI	Cyears). (See Insui	ucuons.		11d		
d	Foreign tax credit. (See	instructions.)		our income tax I	return as "additional			
е	Foreign tax credit. (See Subtract line 11d from	n line 11c. Enter t	his amount on y	our moonie tax i	Otalii as Lauren	11e		
	tax." (See instructions.) F Determine interest on		to the determine	on line 11e	using the rates and			
1								
	methods of section 662	1. Enter the aggregation 42	204 Floctions a	nd Terminatio	n of Section 129	4 Elect	ions	
Pa	rt V Status of Prior	Year Section 12	or each outstan	dina election.	Complete lines 9	and 1	0 only if	there is a
	complete a sep	ion of the section	n 1294 election	ı.				
	— paruar terrimati	(i)	(ii)	(iii)	(iv)	(v)		(vi)
		(1/						
1	Tax year of outstanding							
	election							
2	-							
	which the election relates							
3								
4	Interest accrued on deferred	l						
	tax (line 3) as of the filing date							
_	tatian alastian							
5								
6	1							
_	distributed during the tax year							
7	Deferred tax due with this							
	return		† · · · · · · · · · · · · · · · · · · ·					
8	Accrued interest due with							
	this return			BEING SERVENIES AND				
,	Deferred tax outstanding after			()				
_	partial termination of election							
10		1						
	termination of election · · ·						Earn 862	1 (Rev 12-2004)

FORM 8621 SUPPORTING SCHEDULES

NAME OF PFIC OR OEF:

YOUKU COM INC

PART IV, LINE 11A - DIST	AND DISP OF STOCK IN SECTION	<u> 1291 FUND</u>
DESCRIPTION	ACQUIRED SOLD	AMOUNT
SECTION 1291 STOCK	12/08/2010 12/08/2010	136.
	TOTAL	136.

Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund See separate instructions.

OMB No. 1545-1002

(Rev. December 2004)	Investment Company of Quantity See separate instruction	ns	Sequence No. 69
Department of the Treasury Internal Revenue Service	See separate instruction	Identifying number (see pa	ge 2 of instructions)
		35-0867955	
TO THE PART OF ME	JSEUM OF ART, INC.		ear or other tax year
Number, street, and room or suite n	no. (If a P.O. box, see page 2 of instructions.)	beginning 07/01/20:	10 and ending 06/30/2011
AOOO MICHIGAN I	ROAD		
City or town, state, and ZIP code or	r country		
TNDTANAPOLIS	1N 40200 Partners	nip S Corporation	Nongrantor Trust Estate
	the anti-	Employer identification n	umber(if any)
foreign investmen	nt company (1110) or 4-	FOREIGNUS	2010
MOORFIELD REAL	ESTATE FUND "A"	Tax year of company or fund: c	alendar year2010_ or other
		tax year beginning	and
NIGHTINGALE HO	OUSE, 65 CORZON BINDE	ending	
TONDON	UK		
Part I Elections (Se	e instructions.)		to lines to though 2c of Part II.
7-3-2-4		eat the PFIC as a QEF. <i>Compl</i>	ete lines la lillough 20 of takin
A Election To Treat	the PFIC as a QEF. I, a shareholder of a PFIC, elect to treection. I, a shareholder on the first day of a PFIC's first to the PFIC Enter gain or loss on line 10f of Part IV.	ax year as a QEF, elect to rec	cognize gain on the deemed
B Deemed Sale Ele	t in the PFIC. Enter gain or loss on line 10f of Part IV.		u t is a controlled foreign
sale of my interest	It in the PFIC. Enter gain or loss on line 10f of Part IV. It in the PFIC. Enter gain or loss on line 10f of Part IV. It in the PFIC. Enter gain or loss on line 10f of Part IV. It is amount on line 10e of Part IV.	C's first tax year as a QEF	that is a controlled locality
C Deemed Dividen	d Election. I, a shareholder on the my share of the p	ost-1986 earnings and pro-	
corporation (CFC	r this amount on line 10e of Part IV.	the time	for payment of tax on the
CISUIDATION. Ente	end Time For Payment of Tax. I, a shareholder of a Cornings and profits of the QEF until this election is terminated to deferred.	EF, elect to extend the times at three	ough 4c of Part II to calculate
D Election to Exte	rnings and profits of the QEF until this election is termin	ated. Complete inter care	make this election.
the fax that illay i	be deferred.	1 Section Co.	••
Note: If any por	tion of line 1a or line 2a of Part II is includible under tion of line 1a or line 2a of Part II is includible under the s 1294(c) and 1294(f) and the related regulations for every cognize Gain on Deemed Sale of PFIC. I, a shareholder that as an excess distribution the gain recognized on the same excess distribution.	ents that terminate this election	IC to which section 1297(e)
Also see sections	S 1294(c) and 120 (c)	er of a former Pricolaria	The DEIC or if I qualify
E Election to Kec	treat as an excess distribution the gain recognized on the PFIC's post-1986 earnings and profits deemed distribution the gain recognized on the PFIC's post-1986 earnings and profits deemed distributions on the profit of Part IV.	ited, on the last day of its	last tax year as a PFIC under
my share of the	PFIC's post-1986 earnings and profits deethed district		DEIC stock that is marketable
section 1297(a).	BEIC Stock La shareholder of a PFIC, e	elect to mark-to-market the r	Prio stock that is many
F Election To Mar	ning of section 1296(e). Complete Part III.		through 2c if you are making
	- Qualified Electing Fund (QEF). All QLI	shareholders complete lines 13	a though 26. If you are
Part II Income Fi	o complete lines 3a through 4c. (See page 5 of instructions.)		÷
			•
		100	
b Enter the portion	or that may be excluded under section 1293(g) 1b		с
	ing to the Enter this amount on your tax rotal.	ome	153
4-	shore of the total net capital yair of the de-		
	of line 2a that is included in income		
b Enter the portion	or that may be excluded under section 1293(g) 2b	to the thin amount	
section 551 of 551	from line 2a. This amount is a net long-term capital	gain. Enter tris amount	2c
C Subtract line 25	from line 2a. This amount is a not long that he hedule D used for your income tax return. (See instructions.)		3a
	mount of cash and the latt market value		86.3
b Enter the total at	ed or deemed distributed to you during the		
10	o - instructions \		and the second
	of line 3a not already included in line 35 and 1		- de
-Heibutable to st	hares in the QEF that you disposed on program	l l	
othenuise transfel	rred during the tax year		3d
			3e
		ITIL III DI dUNCIO)	
	and no nomini di lilic ia vi		
Important: IT IIII	ne 3e is greater than zero, and no pottern 1 or 951, you may make Election D with respect to the amount 4a	on line 3e. I	3F (1)
	. for the tay year (See Instructions.)		
4a Enter the total ta	tor the tay vear determined without to		
b Enter the total	ared on line 3e	as which is	
		for payment of which is	4c
c Subtract line 4	4b from line 4a. This is the determined the same sale with the same sale sale sale sale sale sale sale sal		Form 8621 (Rev. 12-200
extended by ma	Ining Livestone		

н							Page 4
om 86	21 (Rev. 12-2004) Gain or (Loss) Fro	na J. to Mork	et Election (Se	e page 5 of ins	structions.)		
Part	Gain or (Loss) Fro	m Mark-to-Iviai K	be end of the tax V	rear		5	
5	Enter the fair market value o	your i i o otook	44 4-44-00			6	
6	Enter the fair marker value of Enter your adjusted basis in Excess. Subtract line 6 from	the stock at the end	- here include th	is amount as ordin	ary income		
7	Excess Subtract line 6 from	iline 5. if a gairi, su	p nere. molaco a.			7	
•	on your tax return. It a loss,	8					
8		9	Carro V				
-	Enter the smaller of line / o	rine o. morado ano a	COtable of	a Section 129	1 Fund (See pa	ge 6 of in s t	tructions.)
9		m and Disposition	ons of Stock of	ibution (see in:	structions).		
Part	Complete a separ	atePart IV for ea	ch excess alsu	IDUIION (300 III	er with respect to		
	Complete a separ Enter your total distribution	s from the section	1291 fund during	the current tax ye	or see instructions	10a	<u> </u>
10a	Enter your total distribution the applicable stock. If the	holding period of the	e stock began in t	he current tax yea	that were excess		
	the applicable stock. If the	ons (reduced by th	e portions of su	ch distributions	by the fund with		
þ	Enter the total distributions but not incl	uded in income un	der section 1291	ceding the curre	nt tax year (or if	10b	
	respect to the applicable	stock for each of	period before th	e current tax year)	10c	
	the applicable stock. If the Enter the total distribution distributions but not include respect to the applicable shorter, the portion of the	:tetions if the NIII	ber of preceding t	ax years is less tha	an 3.)	10d	
C	Divide line 10h hv 3. (See	IIISU UCUONO II WIT				100	
d		(5).		1. IL- 01/00C	e dietribution WILL	1 1	
е	Multiply line 10c by 125% (1.2 Subtract line 10d from li respect to the applicable	ne 10a. This amount	and you did not	dispose of stock d	uring the lax year,		
	respect to the applicable	t of Part IV. See ins	tructions if you	eceived more are	excess distribution	400	0.
	respect to the applicable do not complete the res during the current tax ye on your income tax return	ear. Also, see instruc	tions for rules lo	reporting a now		10e	
	On VOIL INCOME MA LONG			1701 filma or ivi	ILIEL SCOROLL	1.05	
1	Enter gain or loss from	the disposition of o		d de mot complete	a line 11	10f	THE SHAWLER SOM
		IND III A 1000, ONE	••		aldina Delicii iui		A SAME TO SAME THE SA
440	Aut L a ctatement IC	or each distribution		AVCACE MISTRIDITIO	on to each day in		
1 10	Attach a statement for each share of stock or your holding period. Add	· block of strates in	allocated to days	in each tax year.	tay year		第一次中国企业的
	your holding period. Add b Enter the total of the a	mounts determined	in line 11a that	are allocable to t	he current tax year		E TO AN IN THE REAL PROPERTY.
	and tax years before the amounts on your income	tax return as other	income		your holding period	1 1	
	amounts on your income c Enter the aggregate in	creases in tax (befo	ore credits) for e	ach tax year iii	your more no	11c	
	c Enter the aggregate in (other than the current t	ax year and pre-PFIC	years). (See instru	ictions.)		11d	
	(other than the current to defend the current to determine the current	instructions.)					
	d Foreign tax credit. (See e Subtract line 11d from	line 11c Enter th	nis amount on yo	our income tax r	etum as additional	11e	
	e Subtract line 11d from tax." (See instructions.)	in line in a					
	tax." (See instructions.) f Determine interest on	and not increase	in tax determine	ed on line 11e	using the rates and	445	A-2 - 22/48
	f Determine interest on	each het moreces	ate amount of inte	rest here. (See ins	structions.)	4 Election	S
-	f Determine interest on methods of section 662	Year Section 12	94 Elections a	nd Terminatio	n of Section 123	and 10 0	only if there is a
F	art V Status of Phon	teal codumn fo	r each outstan	ding election.	Combiere in es	and io	,
	Complete a se	parate column lo	1294 election	7.	,	(44)	(vi)
	partiai terriliriat		(il)	(iil)	(iv)	(v)	
_		(i)					
	1 Tax year of outstanding						
	election						
	2 Undistributed earnings to						
	which the election relates						
	greeners of the first		1				
	3 Deferred tax			-			
	deferred						
	tax (line 3) as of the filing date			 			
	tax (line 3) as of the fulling care						
	take election	1					
	5 Event terminating election]				
	6 Earnings distributed or deeme						
	distributed during the tax year	•					
	7 Deferred tax due with this	s				 	
	return	•					
	8 Accrued interest due with	h {	1			525504 (CANA)	TO SEE SECTION ASSESSMENT
	this return		or local PERSONS I	STATE OF STREET	The state of the s		
	9 Deferred tax outstanding aft					1	
	partial termination of election		+				
	10 Interest accrued after part	ial	1			1	
	termination of election						Form 8621 (Rev. 12-2004)
	(emination of circus						

Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return. See separate Instructions.

OMB No. 1545-1668

Attachment Sequence No. 118

Information furnished for the foreign partnership's tax year beginning 01/01/2010 , and ending 12/31/2010

ment of the Treas	bea		01/01/		1 =====	's identifying r	number			
I Revenue Servic		7 (1	05 /	2065			
of person filing th	MUSEUM OF AR	T				ories of Filers in	the instructi	ons and check a	pplicable box(es):
IANAPOLIS	re not filing this form with	your tax ret	um) A	Category of f		3	x 4			
address (if you a	re not ming and terms			1	2	07/01/		and ending	06/30/2	011
			В	Filer's tax ye	ar beginning	077017	2010	_ , and ending _		
			\ \					Other \$		
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iler's share of I	iabilities: Nonrecourse per of a consolidated g	roup but r	not the parent,	enter the fol	lowing inform	ation about the	parent.			
f filer is a mem	ber of a consolidated 9	1000			EIN					
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Address										
	· · · · · · · · · · · · · · · ·	rs (see in	structions)					(4) Che	eck applicable bo	x(es)
Information abo	out certain other partne	1 (000 11.				(3) Identifying	g number	Category 1	Category 2	Constructive owner
(1) Na	me		(2)	Address				Category		
						ļ				
					11, 1	<u> </u>				
						<u> </u>	- T.D	2 EIN (if any	v)	
A		mbin CF	NTTENT G	LOBAL RI	ESOURCES	FUND II	T, PL	98-06		
Name and add	dress of foreign partner	Sulf of	H SOUTH.	PO BOX	10795			2 Country 11	nder whose la	ws organized
A EARTH C	LOSE, WEST BA	I DEAC	.11 0001117					CJ		
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	of business		activity co	ousiness de number	7 Principactivit				1	
organization	of business	Æ	activity co	ousiness de number						
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	of business	r the foreign	activity co	o's tax year:	activit	y 	partnership	must file:		
	of business	r the foreign	activity co	o's tax year:	activit	k if the foreign	partnership	must file:	Form 10	065 or 1065-B
Provide the f	of business ollowing information foress, and identifying nur	r the foreign	activity co	o's tax year:	activit	k if the foreign	Fo	orm 8804		065 or 1065-B
	of business ollowing information foress, and identifying nur	r the foreign	activity co	o's tax year:	2 Chec	k if the foreign Form 1042 ice Center whe	Form 10	orm 8804 165 or 1065-Bi	s filed:	
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Provide the f Name, addre United State Name and a organization Were any s Enter the r attached to How is this Did the pa 1.1503(d) Does this The p The v if "Yes," Sign Here Only if You Are Filing	of business collowing information for cess, and identifying nur s conditions of foreign partr and identifying nur s conditions of foreign partr and identifying nur s conditions of foreign partr and identifying nur conditions of foreign partr conditions o	r the foreignber of ago mership's a de by the following the ctions) under the arate units of the following for the is total assigner. I decid	gn partnership gent (if any) in agent in countr oreign partner on Return of L lowing require tax year were sets at the end 1-1, and M-2. are that have	ry of Tship? J.S. Persons Luntry in which eaning of Recements? Less than \$2 d of the tax yes examined this laration of pre	2 Chec Serv 4 Nam recoo and With Respect	k if the foreign Form 1042 ice Center whe e and address rds of the foreign records, if differ t To Foreign Di ed? tion 1.1503-2(c)	of person(s gn partners) rent sisregarded	orm 8804 165 or 1065-B is some simple	of the books a cation of such l	No No X No
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Provide the f Name, addre United State Name and a organization Were any s Enter the r attached to How is this Did the pa 1.1503(d) Does this The v If "Yes," Sign Here Only If You Are Filling This Form Separately	of business ollowing information for ess, and identifying nurs address of foreign partra a, if any special allocations mad number of Forms 8858, to this return (see instru s partnership classified attnership own any sepi-1(b)(4)? partnership meet both artnership's total receip alue of the partnership' do not complete Sche Under penalties of perit and belief, it is true, co information of which pro	r the foreignber of ago mership's a de by the following the under the arate units of the following to the is total assignment of the is total assignment of the ingreed, and apparer has	gn partnership gent (if any) in agent in countr oreign partner on Return of U e law of the co s within the me tax year were sets at the end 1-1, and M-2. are that I have complete. Dec any knowledge.	rship? J.S. Persons untry in which eaning of Regular than \$2 d of the tax year:	2 Chec Serv 4 Nam record and service s	k if the foreign Form 1042 ice Center whe e and address rds of the foreign records, if differ t To Foreign Di ed? tion 1.1503-2(c)	of person(sign partners) isregarded of person(sign partners) isregarded of person(sign partners) isregarded	orm 8804 65 or 1065-B is sometimes of the local statement of liability comparison.	of the books a cation of such I Yes Yes Yes Ants, and to the I any member) is	No No X No S X No S X No S S X No S S X No S S S S S S S S S S S S S S S S S S
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THE TALE DETIEN		Final I	(-)	of CI	irrent Year Income,
SHORT YEAR INITIAL RETURN	Par	rt III	Deductions, Cred	dite	and Other Items
dule K-1			Deductions, Cree	15	Credits
m 1065) For calendar year 2010, or tax out of the Treasury out of the Treasury out of the Treasury	1	Ordir	nary business income (loss)		
year beginning			(logs)	-+	
Revenue Service ending	2	Net	rental real estate income (loss)	- 1	
Charama Deductions.			(loss)	16	Foreign transactions
tner's Share of Income, Deductions,	3	Othe	er net rental income (loss)		
dits, etc. See back of form and separate Instructions.		<u> </u>			
About the Partnership	4	Gua	ranteed payments		
Information About the Furthern number		 	- Linnano	-	
Partnership's employer identification number	5	Inte	erest income	i '	
0668613 Partnership's name, address, city, state, and ZIP code		 -	'' disidents	1	
Partnership's name, address, city, state,	6a	Ord	linary dividends		
	-	1-	alified dividends		
army 1 DIV I.P	6 b	ا	SIMPO GIAIGONES		
XII-A DEL CITY 1 AIV, LP	-	+	oyalties	1	
LAFAYETTE PLACE, 3RD FLOOR	_ 7	K	yalues	1	
EENWICH, CT 06830 IRS Center where partnership filed return	<u> </u>	+,	et short-term capital gain (loss)	1	
	8		at allottetoni enhance		
NCI NNATI Check if this is a publicly traded partnership (PTP)	-	-	et long-term capital gain (loss)	17	Alternative minimum tax (AMT) items
	98	a N	Et long-tom		
Part II Information About the Partner	9	-	ollectibles (28%) gain (loss)		
Part II Information About the Parties. Partner's identifying number 14	1 9	"	Officialist (===) o	1_	
		c l	Inrecaptured section 1250 gain		
-0867955 Partner's name, address, city, state, and ZIP code	١٠	" `	,,,,,, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
Partition 5 manufactures of the	110	-	Net section 1231 gain (loss)	1	8 Tax-exempt income and nondeductible expenses
NDIANAPOLIS MUSEUM OF ART, INC.	- 1"	٦,	_		1101100000
NDIANAPOLIS MOSEON O JENNIFER BARTENBACH	1	-+	Other income (loss)		
000 MICHIGAN ROAD	Ι.	٠ ١			
TN 46208					
a streether or U.C.	TC	-			
member-manager	- t				
H X Domestic partner	- 1				19 Distributions
	t	12	Section 179 deduction	 -	
What type of entity is this partner? CORPORATION					
the set amfit loss and capital (see instructions).	t	13	Other deductions	-	20 Other information
Reginning	.,	W*	1,13	35.	20 Other information
Profit	% %			- 1	
% <u>11.854526</u>	/ %				
Loss % 11.834320				- 1	
				 -	
K Partner's share of liabilities at year end:	135	14	Self-employment earnings (lo	SS)	
\$	1111				
in a secure financing				1	
Recourse \$			See attached statement	لِــــ	distance information
		1	-usebad statement	for ad	Oltional information.

153,030

151,895.

For IRS Use Only

If "Yes", attach statement (see instructions) For Paperwork Reduction Act Notice, see Instructions for Form 1065.

Did the partner contribute property with a built-in gain or loss?

X No

Capital contributed during the year . . \$ _

Current year increase (decrease) . . . \$ Withdrawals & distributions \$ (

Ending capital account X Tax basis GAAP Other (explain)

JSA 0P1200 2.000

Yes

M

. \$ _____15 Section 704(b) book

Schedule K-1 (Form 1065) 2010

This list identifies the codes used on Schedule K-1 for all partners and provides summarized reporting information for partners who file Form 1040. For detailed reporting and filling information, see the separate Partner's Instructions for Schedule K-1 and the instructions for your income tax return.

Ordinary business income (loss). Determine whether the income (loss) is See the Partner's Instructions K Disabled access credit passive or nonpassive and enter on your return as follows. L Empowerment zone and renewal Report on Form 8844, line 3 See the Partner's Instructions community employment credit See the Partner's Instructions Schedule E, line 28, column (g) M Credit for increasing research activities Passive loss Passive income Schedule E, line 28, column (h) N Credit for employer social security Form 8846, line 5 Nonpassive loss Schedule E, line 28, column (j) and Medicare taxes Form 1040, line 61 See the Partner's Instructions Nonpassive income See the Partner's Instructions O Backup withholding Net rental real estate income (loss) P Other credits Other net rental income (loss) Schedule E, line 28, column (g) 16. Foreign transactions Net Income See the Partner's Instructions A Name of country or U.S. Net loss Schedule E, line 28, column (j) possession Guaranteed payments Form 1116, Part I Gross Income from all sources Form 1040, line 8a Interest Income Form 1040, line 9a Gross income sourced at C Ordinary dividends Form 1040, line 9b 6a. partner level Foreign gross income sourced at partnership level Qualified dividends 6b. Schedule E, line 4 Royalties Schedule D, line 5, column (f) Passive category Net short-term capital gain (loss) Form 1116, Part I Schedule D, line 12, column (f) General category 8. 9a. Net long-term capital gain (loss) 9b. Collectibles (28%) gain (loss) 28% Rate Gain Worksheet, line 4 Other Deductions allocated and apportioned at partner level (Schedule D Instructions) Form 1116, Part I See the Partner's Instructions G Interest expense Form 1116, Part I Unrecaptured section 1250 gain See the Partner's Instructions Deductions allocated and apportioned at partnership level to foreign source 9c. Net section 1231 gain (loss) 10. Other Income (loss) 11. income See the Partner's Instructions Code Passive category Form 1116, Part I A Other portfolio income (loss) See the Partner's Instructions General category B Involuntary conversions Form 6781, line 1 K Other Sec. 1256 contracts & straddles Other information See Pub. 535 D Mining exploration costs recapture E Cancellation of debt Form 1116, Part II Form 1040, line 21 or Form 982 L Total foreign taxes paid Form 1116, Part II M Total foreign taxes accrued See the Partner's Instructions Form 1116, line 12 N Reduction in taxes available for credit O Foreign trading gross receipts Other income (loss) See the Partner's Instructions Form 8873 Section 179 deduction Form 8873 P Extraterritorial income exclusion 13. Other deductions See the Partner's Instructions A Cash contributions (50%) Q Other foreign transactions B Cash contributions (30%) 17. Alternative minimum tax (AMT) items C Noncash contributions (50%) A Post-1986 depreciation adjustment See the Partner's See the Partner's D Noncash contributions (30%) B Adjusted gain or loss Instructions and Instructions Capital gain property to a 50% C Depletion (other than oil & gas) the Instructions for D Oil, gas, & geothermal - gross income organization (30%) Form 6251 E Oil, gas, & geothermal - deductions Capital gain property (20%) G Contributions (100%) Other AMT items Form 4952, line 1 18. Tax-exempt income and nondeductible expenses Investment interest expense Schedule E, line 18 Form 1040, line 8b Deductions-royalty income A Tax-exempt interest income See the Partner's Instructions See the Partner's Instructions J Section 59(e)(2) expenditures K Deductions-portfolio (2% floor) B Other tax-exempt income See the Partner's Instructions Schedule A, line 23 C Nondeductible expenses Schedule A, line 28 Deductions-portfolio (other) 19. Distributions Schedule A, line 1 or Form 1040, Amounts paid for medical insurance A Cash and marketable securities See the Partner's Instructions line 29 B Distribution subject to section 737 See the Partner's Instructions N Educational assistance benefits C Other property Form 2441, line 12 Dependent care benefits See the Partner's Instructions 20. Other Information Form 4952, line 4a Preproductive period expenses A Investment Income Q Commercial revitalization deduction Form 4952, line 5 See Form 8582 instructions B Investment expenses from rental real estate activities Form 4136 See the Partner's Instructions Fuel tax credit information Pensions and IRAs Qualified rehabilitation expenditures See the Partner's Instructions See the Partner's Instructions Reforestation expense deduction (other than rental real estate) See the Partner's Instructions Domestic production activities See Form 8903 instructions Basis of energy property information Recapture of low-income housing Form 8903, line 7b Qualified production activities income Form 8611, line 8 credit (section 42(j)(5)) Form 8903, line 17 V Employer's Form W-2 wages Recapture of low-income housing See the Partner's Instructions Form 8611, line 8 W Other deductions credit (other) See Form 4255 14. Self-employment earnings (loss) Recapture of investment credit Note. If you have a section 179 deduction or any partner-level deductions, see the Partner's instructions before completing Schedule SE. See the Partner's Instructions Recapture of other credits Look-back interest - completed See Form 8697 long-term contracts A Net earnings (loss) from Schedule SE, Section A or B K Look-back Interest - income forecast self-employment See the Partner's Instructions See Form 8866 B Gross farming or fishing income method See the Partner's Instructions C Gross non-farm income Dispositions of property with section 179 deductions 15. Credits M Recapture of section 179 deduction A Low-income housing credit (section See the Partner's Instructions 42(j)(5)) from pre-2008 buildings Interest expense for corporate B Low-income housing credit (other) partners See the Partner's Instructions

from pre-2008 buildings

C Low-income housing credit (section 42(j)(5)) from post-2007 buildings Low-income housing credit (other)

from post-2007 buildings E Qualified rehabilitation

expenditures (rental real estate) F Other rental real estate credits

G Other rental credits

H Undistributed capital gains credit

Alcohol and cellulosic biofuel fuels credit J Work opportunity credit

Form 8586, line 11

Form 8586, line 11

See the Partner's Instructions

Form 1040, line 71; check box a

Form 6478, line 8 Form 5884, line 3 Section 453(I)(3) information Section 453A(c) information

Section 1260(b) information Interest allocable to production

expenditures CCF nonqualified withdrawals

Depletion information - oil and gas

Amortization of reforestation costs Unrelated business taxable income

Precontribution gain (loss) W Section 108(i) information

Other information

See the Partner's Instructions

P	art IV Additional Information Regarding Transfer of Property(see instructions)	
9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:	
((a) Before <u>0.00</u> % (b) After <u>1.28</u> %	
10	Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u>	
	Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 987	X No X No X No X No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes	X No
C	Branch loss recapture Any other income recognition provision contained in the above of	X No X No X No X No
14	Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?	X No
15 a	Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?	X No
b	If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶\$	
16	Was cash the only property transferred?	No
17 a	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?	X No
b	If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:	

(Rev. December 2008)

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

Department of the Treasury Internal Revenue Service

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

Part 1 U.S. Transferor Information (see instructions)

OMB No. 1545-0026

Name of transferor	Ideals to a sure to the state of the state o
INDIANAPOLIS MUSEUM OF ART	Identifying number (see instructions)
1 If the transferor was a corporation, complete questions 1a throu	35-0867955
a If the transfer was a section 361(a) or (b) transfer, was the trans	sferor controlled (under section 368(c)) by
5 or fewer domestic corporations?	Yes V No
b Did the transferor remain in existence after the transfer?	X Yes No
If not, list the controlling shareholder(s) and their identifying nur	nber(s):
Controlling shareholder	Idontify in a much
	Identifying number
c If the transferor was a member of an affiliated group filing a cons	solidated return, was it the parent
corporation?	
If not, list the name and employer identification number (EIN) of	the parent corporation:
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(5) been made?	
	Yes No
2 If the transferor was a partner in a partnership that was the	e actual transferor (but is not treated as such under section 367),
oompiete questions za through zo.	(out to not abaded as such under section 507),
a List the name and EIN of the transferor's partnership:	
Name of partnership	EIN of partnership
b Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets? Yes No
c Is the partner disposing of its entire interest in the partnership?	
 is the partner disposing of an interest in a limited partnership that 	t is regularly traded on an established
securities market?	Yes No
transletee roreign corporation information (see i	nstructions)
Name of transferee (foreign corporation)	4 Identifying number if any
PHOENIX ASIA REALESTATE INVESTMENTS INVEST	V(A), LP FORETCHUS
C/O MAPLES CORP.	SERVICES LTD PO BOX 309, UGLAND HOUSE
RAND CAYMAN CJ KY1-1104 Country code of country of incorporation or organization (see just)	
see its	ructions)
J Foreign law characterization (see instructions)	
ARTNERSHIP	
Is the transferee foreign corporation a controlled foreign corporation Paperwork Reduction Act Notice, see separate Instructions.	on? Yes X No
touce, see separate instructions.	Form 926 (Rev. 12-2008)

Type of property Cash	(a) Date of transfer	(b) Description of property	(c) Fair market value on	(d) Cost or other	(e)
Cash	VAR	TO THE RESERVE TO A SECOND PORTS	date of transfer	basis	Gain recognized on
Stock and			900,000.	D-A4	transfer
securities					
Installment obligations,					
account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation					
recapture (see Temp. Regs. sec. I.367(a)-4T(b))			:		
angible property					
usiness not listed nder another ategory					
tangible					
operty					
pperty to be used (as scribed in					
mp. Regs. sec. 67(a)-4T(c))					
perty to be I (as cribed in					
np. Regs. sec. 67(a)-4T(d))					
sfers of oil and working interests lescribed in					
p. Regs. sec, ?(a)-4T(e))					
r property					
plemental Informa	tion Required To Be	Reported (see instruc	tions):		

0	Additional Information Regarding Transfer of Property(see instructions)	Pa
9 1	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:	
,	a) Before 0, 00	
,	a) Before <u>0.00</u> % (b) After <u>0.47</u> %	
10		
	Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u>	
11	Indicate whether any transfer and the second	
а	Indicate whether any transfer reported in Part III is subject to any of the following:	
b	Gain recognition under section 004/4/2/2	
C	Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Yes Yes Yes	X
ď	Exchange gain under section 987 Did this transfer result form	، بعتم
		X
12	Did this transfer result from a charge is a	X
	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes	
		LX N
	1.367(a)-4T through 1.367(a)-6T for any of the following:	
-	runted property	
b	Depreciation recapture	[
C	Depreciation recapture Branch loss recapture Any other income recognition provision.	X N
d /	Branch loss recapture Any other income recognition provision contained in the above-referenced regulations Yes Yes	XN
; [Did the transferor transfer assets which qualify for the transferor. Yes	LAJ N
	Oid the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes	₩.
S	ection 1.367(a)-1T(d)(5)(iii)?	
		V N
		A NO
นา	ansferred > \$	
VV	as cash the only property transferred?	
- 14/	as intangible property (within the	T No
4 VV	as intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the	140
แล	insaction?	
		X No
, II tro	Yes," describe the nature of the rights to the intangible property that was transferred as a result of the	27 140
uai	isaction: property that was transferred as a result of the	
	Form 926 (Rev. 12	

(Rev. December 2008)

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

OMB No. 1545-0026

Department of the Treasury Internal Revenue Service	to a Foreig	n Corporation	OMB No. 1545-(
Part I U.S. Transferor	Attach to your income tax return for	the year of the transfer or distribution.	Attachment
Name of transferor	Information (see instructions)		Sequence No.
INDIANAPOLIS MU	SEUM OF ADT	Identifying numb	er (see instructions)
i line transferor was a co	moration and La		55
a If the transfer was a secti	on 361(a) or (b) transfer, was the transfer prations?	1d.	55
5 or fewer domestic corpo	on 50 ((a) or (b) transfer, was the transfer prations? in existence after the transfer?	or controlled (under section 368(c)) by	
b Did the transferor remain	in existence after the transfer	* * * * * * * * * * * * * * * * * * * *	Yes X No
If not, list the controlling s	in existence after the transfer? hareholder(s) and their identifying number	X	Yes No
		r(s):	
Controll	ing shareholder		
		ldentifying number	
c If the transferor was a man			
COrporation?	per of an affiliated group filing a consolida	ted return, was it the parent	
If not, list the name and own	Ployer identification number (FIN) of the	C-	
	of the pa	arent corporation:	esNo
Name of par	ent corporation		
		EIN of parent corporation	
Have basis adjustments unde	er section 367(a)(5) been made?		
		Ye Ye	s Date
or the transferor was a part	ner in a partnership that was the actu	al transferor (but is not treated as such und	- LINO
List the name and 5th	gh 2d.	al transferor (but is not treated as such und	der section 367
List the name and EIN of the	transferor's partnership:		r.
Name of p	partnership		
		EIN of partnership	
Did the partner pick up its pro-	rata share of gain on the transfer of partnerst in the portnerst in		
Is the partner disposing of its	entire interest in the partnership? nterest in a limited partnership that is a second	ership assets? Yes	
Is the partner disposing of an i	ntoroot in a live par mership?		⊢
securities market?	Paranciship that is regt	Jiarly traded on an established	⊢ No
I ransferee Foreign C	Omnound:		
Transperse (IDL6IGU CV	(Doration)	tions)	No
NHEIM GLOBAT MAD	KETS FUND LTD	4 Identifying numbe	er if any
,	(() () () ()	FOREIGNUS	··· · · · city
ND CAYMAN CAYMAN	C/O CAMPBELL CORPORATI	E SERVICES LTD ALPERT PAN	VTON STE
code of country of inco	TSLANDS CJ KY1 1104 rporation or organization (see instructions)	···ON SIE,
		,	
Foreign law characterization (se	ee instructions)		
PORATION			
o use transferee foreign corpora	tion a controlled foreign corporation?		
The first field of the field of	separate Instructions.	Yes X	No
000		Form 920	6 (Rev. 12-2008)
			···,

property	(a) Date of transfer	(b) Description of property	(c) Fair market value on	(d) Cost or other	(e)
Cash	VAR	property	date of transfer	basis	(e) Gain recognized o transfer
Stock and			6,000,000.	全国的基础。 对自己的基础	dansier
securities					
Installment obligations,					
account					
receivables or					
similar property					
Foreign currency					
or other property					
or other property denominated in					
foreign currency					
Inventory					
-					
Assets subject to					
Pepreciation					
emp. Regs. sec					
.367(a)-4T(b)) angible property					
sed in trade or					
usiness not listed —— nder another					
itegory					
angible					
operty					
operty to be					
sed (as scribed in					
ND. Regs sec					
5/(a)-4T(c))					
perty to be					
cribed in					
np. Regs. sec. 7(a)-4T(d))					
sfers of oil and					
vorking interests escribed in					
. Regs, sec.					
(a)-4T(e))					
property					
piemental Informa	tion Required To Be I	Reported (see instruc	tions):		
			•		

(Rev. December 2008)

Department of the Treasury Internal Revenue Service

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

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

OMB No. 1545-0026

Part I U.S. Transferor Informati	urn for the year of the transfer or distribut	tan C	Attach
Part I U.S. Transferor Information (see instructions)	and the state of t	ion.	Attachment Sequence No. 1:
INDIANAPOLIS MUSEUM OF ART		Identis I	
II UIE ITANSIAFOF WAS A SOME THE		IdentifyIng number (s	ee instructions)
If the transferor was a corporation, complete questions 1a throat If the transfer was a section 361(a) or (b) transfer, was the transfer was the transfer was a section 361(a) or (b) transfer, was the transferonce of the transf	ough 1d.	35-0867955	
5 or fewer domestic corporations?	nsferor controlled (under section 36	38(c)) by	
and the transferor remain in existence after the transferor		Ye:	s Whi
b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identifying nu		X Ye	111
number of the state of t	mber(s):		S LNo
Controlling shareholder	ldenti	fying number	
c If the transferor was a member of an affiliated group filing a cons			
corporation?	olidated return, was it the parent		
corporation? If not, list the name and employer identification number (EIN) of the second corporation is a member of an affiliated group filing a constant.	*** * * * * * * * * * * * * * * * * *	Π.,	
If not, list the name and employer identification number (EIN) of to	he parent corporation:	· · · · · L Yes	L No
Name of parent corporation			
	EIN of parei	nt corporation	
d. Have book and the			
d Have basis adjustments under section 367(a)(5) been made? .			
If the transferor was a partner in a mark		· · · · Yes	No
If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership.	actual transferor (but is not trans	tod	
List the name and EIN of the transferor's partnership:	(Sur is not dea	ted as such under s	section 367),
and or or a partitle iship:	1		
Name of partnership	Elbi - s		
	EIN of par	rtnership	
Did the post-			
Did the partner pick up its pro rata share of gain on the transfer of p Is the partner disposing of its entire interest in the partner by	Partnership appare		
Is the partner disposing of its entire interest in the partnership?	Side Ship assets?	Yes	No
Is the partner disposing of an interest in a limited partnership? securities market?	regularly traded on a	· · · · · · · · Yes	No
II diisieree Foreign O.	• • • • • • • • • • • • • • • • • • •		
Name of transferee (foreign corporation) Name of transferee (foreign corporation)	tructions)	· · · L Yes	No
OVIS CAPITAL DADONADA			
C (C CC)		entifying number, if	any
PRGE TOWN GRAND GRAND GRAND SACHS (CAYMAN) TRUST PO E	FOREIGNUS BOX 896, HAR	DOUD =
Country code of country of incorporation or organization (see instruct	tions)	050, MAR	POOK C
Foreign law charactorine:			
Foreign law characterization (see instructions) PORATION			
Is the transferee foreign as a second			
Is the transferee foreign corporation a controlled foreign corporation? perwork Reduction Act Notice, see separate Instructions.		1-1	
see separate Instructions		Yes X No	
1.000		Form 926 (Re	v. 12-2008)

Type of property	(a) Date of transfer	(b) Description of	(c) Fair market value on	(d) Cost or other	
Cash	VAR	property	date of transfer 1,500,000.	Cost or other basis	(e) Gain recognize transfer
Stock and securities			=7000,000.		这些人就在1988年
Installment					
receivables or similar property					
oreign currency or other property					
enominated in preign currency					
ventory					
sets subject to preciation Capture (see					
mp. Regs. sec. 367(a)-4T(b))					
ngible property ed in trade or siness not listed					
der another egory					
ingible perty					
perty to be					
ed (as					
p. Regs. sec. 7(a)-4T(c)) erty to be					
(as					
D. Regs. sec. (a)-4T(d)) fers of oil and					
Orking interests scribed in					
Regs. sec. a)-4T(e))					
property					
lemental Informati	on Required To Be	Reported (see instruc	ctions):		

Part IV Additional Information Regarding Transfer of Property(see instructions) 9 Enter the transferor's interest in the feature of the feat	P
9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer:	
(a) Potest 0 00	
(a) Before <u>0.00</u> % (b) After <u>0.36</u> %	
Type of nonrecognition transaction (see instructions) \blacktriangleright <u>SECTION 351</u>	
1 Indicate whether and	
"Totale Wilefuel and transfer to a series of the series of	
a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 4500(f)	
b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 2027	· · Yes X
c Recapture under section 904(f)(5)(F) d Exchange gain under section 987	Yes X
Did this transfer result from a change in the classification of the	·· LYes X
Did this transfer result from a change in the classification of the transferee to that of a foreign corporation	2 Dy 153
whether the transferor was senting to	n? Yes X N
1.367(a)-4T through 1.367(a)-6T for any of the following:	
a Tainted property b Depreciation recapture c Branch loss recapture	
	· Yes X N
d Any other income recognition provision contained in the above-referenced regulations	· Yes X N
resognition provision contained in the above-referenced regulations	· Yes X N
Did the transferor transfer assets the distributions	. Yes X N
Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3) ⁴ Did the transferor transfer foreign goods it	
Did the transferer transfer 367(a)(3)	? Yes X No
Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations	
Regulations	s
	Yes X No
transferred > \$transferred	
Was intendible property transferred?	
	X Yes No
Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the	
If "Yes," describe the nature of the rights to the	Yes X No
If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the	
as a result of the	

(Rev. December 2008)

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

Department of the Treasury Internal Revenue Service Attach to your income tax return for the year of the transfer or distribution. Part I U.S. Transferor Information (see instructions)

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	rn for the year of the transfer or distributi	ion.	Attachment Sequence No. 12
INDIANAPOLIS MUSEUM OF ART		Ide att 1	Kasama
1 If the transferor was a service of the transferor was a serv		Identifying number (se	ee instructions)
1 If the transferor was a corporation, complete questions 1a thro a If the transfer was a section 364(a) or (b) or	ugh 1d.	35-0867955	
5 or fewer domestic comparting or (b) transfer, was the tran	sferor controlled (under seeting as	20/-33 1	
b Did the transferor remain in existence a	· · · · · · · · · · · · · · · · · · ·	56(C)) by	
b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identifying pure	*****	Yes	A
If not, list the controlling shareholder(s) and their identifying nur	nber(s):	Yes	sNo
Controlling shareholder	Identi	fying number	
	, acriti	number	
			-
a If the travel			
c If the transferor was a member of an affiliated group filing a conscious corporation?	_l		
If not liet the name is the second of the se	idated return, was it the parent		
corporation? If not, list the name and employer identification number (EIN) of the	e parent corporation	· · · · · Yes	No
Name of parent corporation	- Parent corporation:		110
	EIN of parer	nt corporation	
			·
d Have basis adjustments under section 367(a)(5) been made?			
, section 367(a)(5) been made?			
If the transferor was a partner in a partnership that		Yes	No
If the transferor was a partner in a partnership that was the complete questions 2a through 2d. a List the name and EIN of the transferore partnership.	actual transferor (but is not trea	ited as such under	
a List the name and EIN of the transferor's partnership:		sacif dildel	section 367),
Name of partnership			
or partitership	EIN of par		
	or par		
b Did the partner risks in			
b Did the partner pick up its pro rata share of gain on the transfer of partner disposing of its entire interest in the partnership.	artnership assots?		
c Is the partner disposing of its entire interest in the partnership?	and the dasets?	· · · · Yes	No
d Is the partner disposing of its entire interest in the partnership? Is the partner disposing of an interest in a limited partnership that is securities market?	regularly traded on an actability	· · · · L Yes	No
Hidristeree Foreign O.	- · · · · · · · · · · · · · · · · · · ·	<u></u>	
	ructions)	Yes Yes	No
NATUS CAPITAL OVERGER C		lentificing I	
(C / C)		lentifying number, if FOREIGNUS	any
AND CAYMAN GRAND CAYMAN CJ KY1-1111 Country code of country of incorporation at a second country of incorporation at a se	ED SVCS (CAYMAN)	CRICKET CO T	III CIII
	2002	CRICKET SQ H	UTCHIN
Foreign I	uns)		
Foreign law characterization (see instructions)			
REORATION			
Is the transferee foreign corporation a controlled foreign corporation?			
see separate instructions		Yes X No	
1.000		Form 926 (Re	ev. 12-2008\
		V	

Part III	Information	Regarding	Transfer of	Property	(see i	nstruction	 1S)
----------	-------------	-----------	-------------	----------	--------	------------	---------

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
Cash	VAR	YAT GERMAN THE BUREAU	2,579,769.	Dasis	transfer
				. V3 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	A RESIDENCE
Stock and					
securities					
		İ			
nstallment					
obligations,		ļ			
ccount	7				
eceivables or	 				
imilar property					
oreign currency					
r other property					
enominated in					
reign currency					
ventory					
ssets subject to preciation					
capture (see					
mp. Reas. sec.					
367(a)-4T(b))					
ngible property					
ed in trade or					
siness not listed					
der another					
tegory					
angible					
perty					
perty to be					
sed (as					
cribed in					
np. Regs. sec.					
67(a)-4T(c))					
perty to be					
(as					
cribed in p. Regs. sec.					5 - 1 1 1 1 1 1 1 1 1 1
7(a)-4T(d))					
sfers of oil and					
working interests					
escribed in					
o. Regs. sec.					
(a)-4T(e))					
				l _{ac}	
r property					
+					
	_				
premental inf	ormation Required To	Be Reported (see ins	structions).		
		, (111)			
		<u> </u>			

lin.	COLUMN A A STORY A A A A A A A A A A A A A A A A A A A		Page
	art IV Additional Information Regarding Transfer of Property(see instructions)		
9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:		
	(a) Before <u>0.00</u> % (b) After <u>0.17</u> %		
10	Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u>		
1	Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 987	. Yes	X No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation		
13	Indicate whether the transferor was required to recognize income under Temporary Regulations section 1.367(a)-4T through 1.367(a)-6T for any of the following:	s	
С	Tainted property Depreciation recapture Branch loss recapture Any other income recognition provision contained in the above-referenced regulations	Yes Yes	X No
14	Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)	? Yes	X No
15 a	Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulation section 1.367(a)-1T(d)(5)(iii)?	; . Yes	X No
b	If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶\$		
16	Was cash the only property transferred?	X Yes	□No
17 a	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?		X No
b	If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:		

(Rev. December 2008)

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

OMB No. 1545-0026

Department of the Treasury		gii Corporation		1043-bi
Internal Revenue Service	Attach to your income tax return f	eturn for the year of the transfer or distribution.		Attachment
Part I U.S. Transf Name of transferor	eror Information (see instructions)		1011.	Sequence No. 1
Tarrie of Baristerol			Identifying number (se	no instructi
1 If the transferor wa	MUSEUM OF ART	2	35-0867955	
a If the transfer was	s a corporation, complete questions 1a throug	h 1d.		
a mane dansiel Mas s	3 Section 361(a) or (b) transfer was the terms		68(c)) by	
			Ye.	s X No
			X Ye	1
If not, list the contro	lling shareholder(s) and their identifying numb	per(s):	· · · · · · · · <u>A</u> le:	sNo
Co	ontrolling shareholder	ldent	ifying number	
			7.0	
ē.				
If the transferor was	a member of an affiliated group filing a consoli	idated return was it the posset		
if not, list the name a	nd employer identification number (EIN) of the	parent corporation	· · · · · · · Yes	L No
	of parent corporation			····
	, a some conportation	EIN of pare	ent corporation	
Have basis adjustmen	A			
riave basis adjustiner	nts under section 367(a)(5) been made?		Yes	
If the transferor was	a nather in a portrouble it		· · · · · ies	No
complete questions 2	a partner in a partnership that was the a la through 2d.	ctual transferor (but is not tre	eated as such under	section 367
List the name and EIN	of the transferor's partnership:			0000011 007
Na	me of partnership	EIN of p	partnership	
oid the partner pick up	its pro rata share of gain on the transfer of pa	artnombin easet 2		
F aloposition	J VI IIS WITH INTEREST IN the ned-a		· · · · Yes	No
is the parther disposing	7 Of an interest in a limited and a second	regularly traded and	· · · · · Yes	No
			ed	
Transferee For	reign Corporation Information (see instruction)	ructions)	· · · · · Yes	No
			lal- are -	
, , ,			Identifying number, FOREIGNUS	if any
VEST 55TH ST	REET, 8TH FLOOR NEW YORK,	NY 10019		
. , seed of country	y of incorporation or organization (see instruct	ions)		
oreign law characteriz	ation (see instructions)			
MPTED COMPANY	/ (366 mstructions)			
s the transferee foreign	corporation a controlled foreign corporation?			
perwork Reduction Act N	otice, see separate instructions.		Yes X	No.
	outer, see separate instructions.			(Rev. 12-2008)
4.000				(- 12-EUUD)

Part III	Information	Regarding 1	ransfer o	f Property ((see instruction	s)
----------	-------------	-------------	-----------	--------------	------------------	----

Type of property Cash	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized
Casn	VAR	经增加的 经营业	2,000,000.	Dasis	transfer
.				THE SAME PARTY AND ADDRESS OF THE SAME PARTY.	Barrier Harrison
Stock and				- 	
securities					
nstaliment					
bligations,			 		
ccount					
eceivables or					
imilar property					
,					
oreign currency other property				V .	
enominated in					
reign currency					
ventory				100	
sets subject to					
preciation					
capture (see					
mp. Regs. sec.					
367(a)-4T(b))					
ngible property					
ed in trade or siness not listed					
der another					
egory					
	 				
angible					
perty					
porty					
					1
perty to be					
sed (as					
cribed in np. Regs. sec.					
67(a)-4T(c))					
perty to be					
(as					
cribed in					
p. Regs. sec.					
7(a)-4T(d))					
sfers of oil and					
vorking interests					
escribed in					
o. Regs. sec. (a)-4T(e))					
(a)-41(e))		12			
г ргорену					
plemental In	formation Position To	Ba Barra A A			
,	formation Required To	De Reported (see ins	tructions):		

Pa	art IV Additional Information Regarding Transfer of Property(see instructions)	raye
9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:	
((a) Before <u>VAR</u> % (b) After <u>4.1</u> %	
10	Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u>	
i	Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 987	X No X No X No X No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	X No
C	Indicate whether the transferor was required to recognize income under Temporary Regulations sections 1.367(a)-4T through 1.367(a)-6T for any of the following: Tainted property Depreciation recapture Branch loss recapture Any other income recognition provision contained in the above-referenced regulations Pid the transferor transfer sector which savelify for the transferor tran	X No X No X No X No
	Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes	X No
	Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?	X No
16	Was cash the only property transferred?	No
	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?	
	If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:	

(Rev. December 2008)

Department of the Treasury Internal Revenue Service

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

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	or are year or are danished or distribute	on.	Sequence No. 128
Name of transferor		identifying symbol (
INDIANAPOLIS MUSEUM OF ART		identifying number (set 35-0867955	e instructions)
If the transferor was a corporation, complete questions 1a through	gh 1d.		
a If the transfer was a section 361(a) or (b) transfer was the transfer	foror controlled ()	38(c)) by	
o or rewer domestic corporations?		7.0	s X No
to remain in existence after the transfer?		X Ye	
If not, list the controlling shareholder(s) and their identifying num	ber(s):		
Controlling shareholder	Identi	fying number	
c If the transferor was a member of an affiliated group filing a conso	lidated return, was it the parent		
corporation?			
If not, list the name and employer identification number (EIN) of the	e parent corporation.	· · · · · Yes	∟_ No
Name of parent corporation		ent corporation	
d Have basis adjustments under section 367(a)(5) been made?			
a value adjustments under section 367 (a)(5) been made?		Yes	No
2 If the transferor was a partner in a partnership that was the complete questions 2a through 2d	actual transforor (but is mut to		
	actual transferor (but is not tre	eated as such under	r section 367),
a List the name and EIN of the transferor's partnership:			
Name of partnership	FIN of	partnership	
	Life Of J	Jarulership	
b Did the partner pick up its pro rata share of gain on the transfer of p	Partnership accets?		
o is the partner disposing of its entire interest in the partnership?		· · · · Yes	No
a is the partiel disposing of an interest in a limited narthership that is	Communication of the control of the	···· Yes	L No
Coddition markets			<u> </u>
	tructions)	····· L Yes	No
(loreign corporation)	4	Identifying number	if any
ROYALCAP VALUE FUND, LTD Mattheward Address (including country)		FOREIGNUS	, ii aily
523 FIFTH AVENUE 24TH FLOOP NEW YORK	NV 1000	1000	
6 Country code of country of incorporation or organization (see instruc	NY 10022 ctions)		
<u>.J</u>	···················		
Foreign law characterization (see instructions)			
XEMPTED COMPANY			
Is the transferee foreign corporation a controlled foreign corporation	?	Yes X	Ī.
or Paperwork Reduction Act Notice, see separate instructions.			No (Rev. 12-2008)
А			

Part III Info	rmation Regardin	g Transfer of Prop	erty/see inct	Tuotiona'		
property	Date of transfer	(b) Description o	f Fair	(c) market value on ate of transfer	(d) Cost or other	(e) Gain recognized o
Cash	VAR	NOT BUILDING	公司	1,500,000.	basis	transfer
Stock and securities				1,300,000.		
Installment obligations, account receivables or similar property						
Foreign currency or other property denominated in oreign currency						
nventory						
ssets subject to epreciation ecapture (see emp. Regs. sec. 367(a)-4T(b))						
angible property sed in trade or siness not listed der another tegory						
angible perty						
pperty to be sed (as cribed in inp. Regs. sec. 67(a)-4T(c))						
pp. Regs. sec.						
sfers of oil and vorking interests escribed in D. Regs. sec. (a)-4T(e))						
r property						

Supplemental Information Required 1	To Re Penerted (
	to be reported (see instructions):	

Form 926 (Rev. 12-2008) Part IV Additional Information Regarding Transfer of Property (see instructions) 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before <u>0.00</u> % (b) After <u>0.86</u> Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u> Indicate whether any transfer reported in Part III is subject to any of the following: 11 a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes X No Indicate whether the transferor was required to recognize income under Temporary Regulations sections d Any other income recognition provision contained in the above-referenced regulations Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes X No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17 a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the

b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the

(Rev. December 2008) Department of the Treasury Internal Revenue Service

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

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	irn for the year of the transfer or distribut	tion.	Attachment Sequence No. 1
		Ido-416 1	
INDIANAPOLIS MUSEUM OF ART		identifying number (s	ee instructions)
1 If the transferor was a corporation, complete questions 1a throat If the transfer was a section 361(a) or (b) in	ough 1d.	35-0867955	
5 or fewer domestic corporations 2	nsferor controlled (under section 2)	69(a)) b	
5 or fewer domestic corporations? b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identificial.	* * * * * * * * * * * * * * * * * * * *	Ye	• [3]
If not list the controlling about the transfer?	• • • • • • • • • • • • • • • • • • • •		
If not, list the controlling shareholder(s) and their identifying nu	mber(s):	· · · · · · · <u>X</u> Ye	sNo
Controlling shareholder	ldenti	ifying number	
		- 8	
c If the transferor was a member of an arm			
c If the transferor was a member of an affiliated group filing a conscorporation?	olidated return, was it the parent		
corporation? If not, list the name and employer identification number (EIN) of the second se	· · · · · · · · · · · · · · · · · · ·	<u></u>	
If not, list the name and employer identification number (EIN) of the Name of parent corporation	he parent corporation:	· · · · · Yes	∟ No
- Parent corporation	EIN of pare	nt corporation	
d Have be in the			
d Have basis adjustments under section 367(a)(5) been made? .			
If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferore and	actual transfers.	· · · · Yes	No
a List the name and FIM as it	detail dansieror (but is not trea	ated as such under	section 367).
a List the name and EIN of the transferor's partnership:			,,
Name of partnership			
	EIN of pa	artnership	
Did the partner pick up its pro rata share of gain on the transfer of partner disposing of its entire interest in the partner disposing of its			
Is the partner disposing of its entire interest in the partnership?	partnership assets?	Yes	No
	Fogularia Annal	 - 	No
Transferee Foreign Community of the Comm	regularly traded on an established	1	140
Name of transferee (foreign corporation)	tructions)	···· Yes	No
LINOR CAPITAL PARTNERS OFFSHORE ITD	4 10	dentifying number, if	any
AND CAYMAN GRAND CANNOT MORGAN STANLEY	FUND SERVICES IT	FOREIGNUS CRICKET SQ,	
struction or organization (see instruc	tions)		HOTCHI
Foreign law characterization (see instructions)			
MPIED COMPANY			
Is the transferee foreign corporation and the transferee			-
sperwork Reduction Act Notice, see separate instructions.		V 1,	
1.000		Yes X No	
1.000		Form 926 (R	ev. 12-2008)

property	(a Date trans	of	nsfer of Property ((b) Description of	(c) Fair market value on	(d)	(a)
Cash		VAR	property	date of transfer	Cost or other basis	Oun recognize
				500,00	0.	transfer
Stock and						THE REAL PROPERTY OF THE PERSON NAMED IN
securities						
				 		
Installment	-			 		
obligations, account	ļ			 		
eceivables or	1					
similar property						
				1		
oreign currency						
or other property lenominated in						
oreign currency						
ventory						
Scoto outile	-					
ssets subject to epreciation						
capture (see						
mp. Reas sec						
367(a)-4T(b))						
ngible property ed in trade or						
siness not listed						
der another						
egory						
angible perty						
p-0.ty						
perty to be						
ed (as						11.00
cribed in						
pp. Regs. sec. 7(a)-4T(c))						
/(a)-41(c))						
erty to be (as						
ribed in L						
D. Rens sec						
7(a)-4T(d))						
fers of oil and orking interests						
scribed in						
Regs. sec.						
a)-4T(e))						
1						
property						24 million and the second
<u></u>						
lementali						
nemental INfo	rmation Requi	red To Be R	Reported (see instru	ctions):		

9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer:		
addistribe corporation before and after the transfer:		
(a) Before <u>0.00</u> % (b) After <u>0.30</u> %		
10 Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u>		
Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 987 12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	Yes Yes	X No X No X No X No
b Depreciation recapture c Branch loss recapture d Any other income recognition provision contained in the above-referenced regulations	Yes X	No
Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?	」Yes □X	No
15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations b If the answer to line 15a is "Yes" enterthered.	Yes X	No
b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value	Yes X] No
Was cash the only property transferred?		
17 a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the section 936(h)(3)(B)).	Yes	No
b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the	Yes X	No

(Rev. December 2008)

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

Department of the Treasury Internal Revenue Service Part I U.S. Tran

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	return for the year of the transfer or distribu	tion.	Attachment Sequence No. 12
INDIANAPOLIS MUSEUM OF ART		identifying number (
If the transferor was a corporation		identifying number (s 35-0867955	ee instructions)
a If the transfer was a section 361(a) or (b) transfer, was the 5 or fewer domestic corporations?	through 1d.		
5 or fewer domestic corporations? b Did the transferor remain in existence after the transfer?	transferor controlled (under section 3	68(c)) by	
Did the transferor remain in existence after the transfero		Ye	s X No
If not, list the controlling shareholder(s) and their identifying	number(s):	Yes	<u> </u>
Controlling shareholder	Idon	······································	
	idelit	ifying number	
If the transferor was a member of an affiliated group filing a cocorporation?		-	
corporation?	onsolidated return, was it the parent		
corporation? If not, list the name and employer identification number (EIN)	of the parent corporation.	· · · · · · · · · · Yes	No
Name of parent corporation			
	EIN of pare	ent corporation	
Have basis adjustment			
Have basis adjustments under section 367(a)(5) been made?			
If the transferor was a partner in a partnership, that was a		· · · · · L] Yes	No
If the transferor was a partner in a partnership that was t complete questions 2a through 2d. List the name and EIN of the transferors partners to	he actual transferor (but is not trea	ated as such under	section 367)
List the name and EIN of the transferor's partnership:		ander ;	section 36/),
Name of partnership			
	EIN of pa	artnership	
Did the partner pick up its pro rata share of gain on the transfer is the partner disposing of its entire interest in the partner by			
Is the partner disposing of its entire interest in the partnership?	or partnership assets?	· · · Yes	No
Is the partner disposing of an interest in a limited partnership? securities market?	at is regularly to the	· · · · Yes	No
Transferee Foreign Community and Community a	traded on an established	t	140
securities market?	instructions)	···· Yes	No
HORAGE CAPITAL DADTING	IA I	dontie :	
Address (including country) WALKERS CORRECT	TD	dentifying number, if	any
RGE TOWN CRAND CAND CARROLLERS CORPORATE	SERVICES LTD WALKE	FOREIGNUS R HOUSE, 87	MADY C
Country code of country of incorporation or organization (see inst	ructions)		TIVIL 2
Oreign law characterization (,		
oreign law characterization (see instructions) IPTED COMPANY			
s the transferee foreign composition			
s the transferee foreign corporation a controlled foreign corporation perwork Reduction Act Notice, see separate instructions.	on?	T 1,,	
000		Yes X No	
000		Form 926 (Re	ev. 12-2008)

property	Pation Regarding Tra (a) Date of transfer	(b) Description of	(c) Fair market value on	(d) Cost or other	(e)
Cash	VAR	property	date of transfer 500,000.	basis	Gain recognized of transfer
Stock and securities			7,500.		
Installment obligations, account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b))					
Tangible property used in trade or pusiness not listed under another category					
ntangible roperty					
roperty to be ased (as escribed in emp. Regs. sec. 367(a)-4T(c))					
operty to be Id (as scribed in mp. Regs. sec. 167(a)-4T(d))					
nsfers of oil and working interests described in np. Regs. sec. 67(a)-4T(e))					
er property					
oplemental Informati	ion Required To Be I	Reported (see instruc	ctions):		

Form 926	(Rev. 12-2008)

(a) Before <u>0.00</u> % (b) After <u>0.04</u> % Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u> Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes X No Indicate whether the transferor was required to recognize income under Temporary Regulations sections 1.367(a)-4T through 1.367(a)-6T for any of the following: c Branch loss recapture Yes d Any other income recognition provision contained in the above-referenced regulations 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes X No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17 a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the

(Rev. December 2008)

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

Department of the Treasury Internal Revenue Service

Attach to your income tax r

Part I U.S. Transferor Information (see instructions) ► Attach to your income tax return for the year of the transfer or distribution.

Part U.S. Transferor Information (see instructions)	urn for the year of the transfer or distribut	ion,	Attachment Sequence No. 1
INDIANAPOLIS MUSEUM OF ART			
1 If the transferor was a community		Identifying number (see	instructions)
If the transferor was a corporation, complete questions 1a thr	ough 1d.	35-0867955	
5 or fewer domestic company (a) or (b) transfer, was the tra	insferor controlled (under section of	20/ 11.	
5 or fewer domestic corporations? b Did the transferor remain in existence after the transfer?	and duride section 30	58(c)) by	
b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identifying particular.		Yes	XNo
If not, list the controlling shareholder(s) and their identifying nu	ımber(s):	<u>X</u> Yes	L_]No
Controlling shareholder	ldenti	fying number	
		number	
c If the transferor was a member of an affiliated group filing a conscorporation?	Solidated set		
corporation?	solidated return, was it the parent		
If not, list the name and employer identification number (FIN) of	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · Yes	\Box .
corporation? If not, list the name and employer identification number (EIN) of Name of parent corporation	me parent corporation:	tes	∟_ No
Name of parent corporation	,	nt corporation	
d Have basis adjustments under section 367(a)(5) been made? .			
ander section 367(a)(5) been made?			
2 If the transferor was a partner in a partnership that was the complete questions 2a through 2d. a List the name and EIN of the transferor's partnership.		· · · · L Yes	No
complete questions 2a through 2d	actual transferor (but is not trea	eted as such	
a List the name and EIN of the transferor's partnership:		med as such under se	ection 367)
and dansieror's partnership:			
Name of partnership			
	EIN of pa	rtnership	
 b Did the partner pick up its pro rata share of gain on the transfer of c Is the partner disposing of its entire interest in the partnership. 			
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 it	partnership assets?	· · · Yes	1
d is the partner disposing of an interest in the partnership?			No
securities market?	regularly traded on an established	···· L Yes	No
I ransteree Foreign O	* * * * * * * * * * * * * * * * * * * *		_
		· · · · Yes	No
AG VENTURE PARTNERS VI (OFFSHORE), LE Address (including country) CENTURY VARIA	4 10	dentifying number, if a	nv
CENTURY YARD, CRICK		FORETGNIIG	=
CORGE TOWN GRAND CAYMAN CJ Country code of country of incorporation	LEI SQUARE, HUTCHII	NS DRIVE, PO	BOX 2
Country code of country of incorporation or organization (see instruc	ctions)		
Foreign law characterization (see instructions)			
RTNERSHIP			
Is the transferee foreign assets it			
Is the transferee foreign corporation a controlled foreign corporation? Paperwork Reduction Act Notice, see separate instructions.	?	T - T	
see separate Instructions		Yes X No	
81.000		Form 926 (Rev.	12-2008)

Type of property	nation Regarding Tra (a) Date of transfer	(b) Description of	(c) Fair market value on	(d)	T
Cash	VAR	property	date of transfer	(d) Cost or other basis	(e) Gain recognized of transfer
Stock and securities			320,000.	Marine Company of the State of	
Installment obligations, account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation ecapture (see Femp. Regs. sec. 1.367(a)-47(b))					
angible property seed in trade or usiness not listed nder another ategory					
tangible operty					
operty to be ased (as scribed in mp. Regs. sec. 167(a)-4T(c))					
pperty to be d (as scribed in mp. Regs. sec. 67(a)-4T(d))					
working interests described in p. Regs. sec. 7(a)-4T(e))					
r property					
plemental Informat	ion Required To Be	Reported (see instruc	ctions);		

Form	926	(Rev.	12-2008
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P	art IV	Additional Information Regarding Transfer of Property(see instructions)		
9	Enter the	transferor's interest in the foreign transferee corporation before and after the transfer:		
((a) Before	e <u>VAR</u> % (b) After <u>2.10</u> %		
10	Туре о	of nonrecognition transaction (see instructions) ► <u>SECTION 351</u>		
,	Gain reGain reRecapt	te whether any transfer reported in Part III is subject to any of the following: ecognition under section 904(f)(3) ecognition under section 904(f)(5)(F) ture under section 1503(d) nge gain under section 987	Yes Yes Yes Yes	X No X No X No X No
12	Did this	s transfer result from a change in the classification of the transferee to that of a foreign corporation?	Yes	X No
0	1.367(a Tainted Deprec Branch	e whether the transferor was required to recognize income under Temporary Regulations sections a)-4T through 1.367(a)-6T for any of the following: d property diation recapture loss recapture ner income recognition provision contained in the above-referenced regulations	Yes Yes Yes	X No X No X No X No
14	Did the	e transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?	Yes	X No
15 a	Did the section	transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations 1.367(a)-1T(d)(5)(iii)?	Yes	X No
b	If the ar transfer	nswer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value rred > \$		
16	Was cas	sh the only property transferred?	X Yes	☐ No
17 a	Was in transact	ntangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the tion?	Yes	X No
b	If "Yes,' transact	" describe the nature of the rights to the intangible property that was transferred as a result of the tion:		
		Form	926 (Rev	/ 12-2008)

(Rev. December 2008)

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

OMB No. 1545-0026

Department of the Treasury Internal Revenue Service

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

Attachment Sequence No. 128

Identifying number (see instructions)
35-0867955
r section 368(c)) by Yes No No No
Identifying number
the parentYes No
EIN of parent corporation
Yes No
out is not treated as such under section 367
EIN of partnership
Yes No Yes No n an established
Yes No
4 Identifying number, if any
FOREIGNUS
MAN) 89 NEXUS WAY, CAMANA
Yes X No
Form 926 (Rev. 12-2008)

DOM: NOTE:	1-6	Deserting	T	D	see instructions)
126:18 di 11 15	intormation	Regarding	Transfer of	Proberty (:	see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	VAR	被包括1985年	2,000,000.		
Stock and securities					
nstallment obligations, account eceivables or similar property					
Foreign currency or other property denominated in preign currency					
nventory					
Assets subject to depreciation ecapture (see Femp. Regs. sec. 1.367(a)-4T(b))					
Fangible property used in trade or pusiness not listed under another category					
ntangible property					
Property to be eased (as described in Femp. Regs. sec. 1.367(a)-4T(c))					
Property to be sold (as described in Femp. Regs. sec. 1.367(a)-47(d))					
Fransfers of oil and gas working interests as described in Femp. Regs. sec. 1.367(a)-47(e))					
Other property					
Supplemental Ir	nformation Required	To Be Reported (see i	nstructions):		

Pa	Part IV Additional Information Regarding Transfer of Property(see instructions)		
9 1	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:		
((a) Before <u>0.00</u> % (b) After <u>0.79</u> %		
10	Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u>		
C	Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 987	Yes Yes Yes Yes	X No X No X No X No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	Yes	X No
C	1.367(a)-4T through 1.367(a)-6T for any of the following: a Tainted property b Depreciation recapture c Branch loss recapture	Yes Yes Yes	
14		」Yes]Yes	X No
15 a	a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?	Yes	X No
b	b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶\$		
16	Was cash the only property transferred?	Yes	☐ No
17 a	a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?] Yes	X No
b	If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:		
		····	

(Rev. December 2008)

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

Department of the Treasury Internal Revenue Service

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

Attachment Sequence No. 128

art I U.S. Transferor Information (see Instructions)	Identifying number (see instructions)
me of transferor	35-0867955
INDIANAPOLIS MUSEUM OF ART	33-080/933
If the transferor was a corporation, complete questions 1a through 1d.	der acction 369(a)) by
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (unc	Yes X No
5 or fewer domestic corporations?	· · · · · · · · · · · · · ·
b Did the transferor remain in existence after the transfer?	
If not, list the controlling shareholder(s) and their identifying number(s):	
Controlling shareholder	Identifying number
80	
c If the transferor was a member of an affiliated group filing a consolidated return, wa	is it the parent
corporation? If not, list the name and employer identification number (EIN) of the parent corporation.	Yes No
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(5) been made?	Yes No
If the transferor was a partner in a partnership that was the actual transfero	r (but is not treated as such under section 36
complete questions 2a through 2d.	
a List the name and EIN of the transferor's partnership:	
Name of partnership	EIN of partnership
b Did the partner pick up its pro rata share of gain on the transfer of partnership asse	ets? Yes No
c Is the partner disposing of its entire interest in the partnership?	Yes No
d Is the partner disposing of an interest in a limited partnership that is regularly trade	d on an established
a 13 the parties diopoening of all interest in a minute parties of	
securities market?	Yes No_
art II Transferee Foreign Corporation Information (see instructions)	
securities market?	Yes No_
securities market? Part II Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation)	4 Identifying number, if any
securities market?	4 Identifying number, if any
securities market?	4 Identifying number, if any
rart II Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) LAG INTERNATIONAL PARTNERS (OFFSHORE) III, Address (including country) 266 EAST MAIN STREET STAMFORD, CT 06902 Country code of country of incorporation or organization (see instructions) J	4 Identifying number, if any
art II Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) LAG INTERNATIONAL PARTNERS (OFFSHORE) III, Address (including country) 266 EAST MAIN STREET STAMFORD, CT 06902 Country code of country of incorporation or organization (see instructions) J	4 Identifying number, if any
rat II Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) LAG INTERNATIONAL PARTNERS (OFFSHORE) III, Address (including country) 266 EAST MAIN STREET STAMFORD, CT 06902 Country code of country of incorporation or organization (see instructions)	4 Identifying number, if any

Type of property	(a) Date of	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized or transfer
	transfer VAR	property	156,307.		
n	VAR				
<u> </u>					
k and			 		
ırities					
allment gations,					
ount				<u>,</u>	
ivables or					
ar property					
eign currency —					H 1700
ther property					
ominated in ign currency					
ight cultericy					
entony					
entory					
ets subject to					
preciation					
apture (see					
np. Regs. sec.					
67(a)-4T(b))					
ngible property ed in trade or					
siness not listed					
der another					
egory					
angible					
perty					
pperty to be sed (as					other to a very self-other terminal and
scribed in					
mp. Regs. sec.					
367(a)-4T(c))					
operty to be					
ld (as					
scribed in mp. Regs. sec.					
367(a)-4T(d))					
ansfers of oil and					
s working interests					
described in					
mp. Regs. sec.					
367(a)-4T(e))		-			
ther property					
iner property					
upplemental info	ormation Require	d To Be Reported (s	see instructions):		
				ű.	

Part	Additional Information Regarding Transfer of Property(see instructions)	
9 En	nter the transferor's interest in the foreign transferee corporation before and after the transfer:	
	Before <u>0.00</u> % (b) After <u>0.00</u> %	
10	Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u>	
b	Indicate whether any transfer reported in Part III is subject to any of the following: Gain recognition under section 904(f)(3)	X No X No X No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	s X No
b	Indicate whether the transferor was required to recognize income under Temporary Regulations sections 1.367(a)-4T through 1.367(a)-6T for any of the following: Tainted property Depreciation recapture Branch loss recapture Any other income recognition provision contained in the above-referenced regulations	s X No
14	Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes	es X No
15 a	Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?	
t	o If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$	
16	Was cash the only property transferred?	es No
17 8	a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?	es X No
	b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:	

(Rev. December 2008)

Department of the Treasury Internal Revenue Service

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

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)	Identifying number (see instructions)
lame of transferor	35-0867955
INDIANAPOLIS MUSEUM OF ART	
 If the transferor was a corporation, complete questions 1a through 1d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (unde 5 or fewer domestic corporations? b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identifying number(s): 	
	Identifying number
Controlling shareholder	identifying number
c If the transferor was a member of an affiliated group filing a consolidated return, was corporation? If not, list the name and employer identification number (EIN) of the parent corporation.	ites Line
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(5) been made?	Yes No
2 If the transferor was a partner in a partnership that was the actual transferor complete questions 2a through 2d.	(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
 b Did the partner pick up its pro rata share of gain on the transfer of partnership asset c Is the partner disposing of its entire interest in the partnership? 	TesNO
d Is the partner disposing of an interest in a limited partnership that is regularly traded securities market?	Yes No
Part II Transferee Foreign Corporation Information (see instructions) 3 Name of transferee (foreign corporation)	4 Identifying number, if any
FLAG PRIVATE EQUITY III (OFFSHORE), LP 5 Address (including country) CENTURY YARD, CRICKET SQUAR	FOREIGNUS RE HUTCHINS DRIVE, PO BOX 2
GEORGE TOWN GRAND CAYMAN CJ	
6 Country code of country of incorporation or organization (see instructions)	
6 Country code of country of incorporation or organization (see instructions) CJ 7 Foreign law characterization (see instructions)	
6 Country code of country of incorporation or organization (see instructions)	Yes X No

Type of property Cash	nformation Regardin (a) Date of transfer	(b) Description of property	(c) Fair market value on	(d)	(e)
Casn	VAR	property	date of transfer	Cost or other basis	Gain recognized or
Stock and			170,000.		transfer
securities					
Installment					
obligations, account					
receivables or					
similar property					
Foreign currency					
Of Other property					
genominated in					
foreign currency					
Inventory					
Assets subject to					
depreciation recapture (see					
Temp. Reas sec					
1.367(a)-4T(b))					
Tangible property used in trade or					
Pusiness not listed					
Inder another					
ategory					
ntangible roperty					
, , ,					
roperty to be					
ased (as					
scribed in					
emp. Regs. sec. 367(a)-4T(c))					
operty to be					
d (as					
scribed in					
mp. Regs. sec. 67(a)-4T(d))					
nsfers of oil and					
working interests					
described in p. Regs. sec.					
7(a)-4T(e))					
er property					
Property					
27772 Para (1272 - 1272 - 1272 - 1272 - 1272 - 1272 - 1272 - 1272 - 1272 - 1272 - 1272 - 1272 - 1272 - 1272 -					
plemental infor	mation Required To	Ro Ponesta da			
		Be Reported (see instruc	tions):		8, 8, 2, 2, 2

b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the

(Rev. December 2008)

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

Department of the Treasury Internal Revenue Service	to a For	eign Corporation	ocity	OMB No. 1545
Part I U.S. Transf	Attach to your to	urn for the year of the transfer or distrib		1
Name of transferor	eror Information (see instructions)		ution.	Attachment Sequence No.
_INDIANAPOLTS	MUSEUM OF ART		12.00	
. II UID HALISTRIOT Was	0.00		Identifying number (see instructions
a If the transfer was a	section 361(a) and the	ough 1d.	1 35-0867955	
5 or fewer domestic	Corporations 2	nsferor controlled (under section	2007 N .	.\S.\\\-2=\\\cdots
b Did the transferor re	Ilidin in evictores at a se		1 1	
If not, list the control	ling shareholder()	*************	1 1	- VIAC
	ling shareholder(s) and their identifying nu	mber(s):	· · · · · · · <u>X</u> Ye	s No
	ntrolling shareholder			
		lden	tifying number	
c If the transferor was a r	nember of an affiliated group filing a conso			
corporation?	amated group πling a consc	olidated return, was it the parent		
If not, list the name and	employer identification number (EIN) of the	* * * * * * * * * * * * * * * * * * * *		
Name o		ne parent corporation:	····· Yes	L No
	f parent corporation	Eint .		
		CIN Of pare	ent corporation	
Have basis adjust—				
dasis adjustments	under section 367(a)(5) been made?			
If the transferor was a	Dorfo - 1	,	· · · · Yes	No
complete questions 2a t	partner in a partnership that was the	actual transferor (but is and		140
List the name and EIN of	partner in a partnership that was the a hrough 2d. the transferor's partnership:	during the state of the state o	ated as such under :	section 367)
	1			,
Name	of partnership	FIN of m	artnership	
			armersuib	
Did the partner pick up its	pro rata share of gain on the transfer of paits entire interest in the partnership?			
Is the partner disposing of	pro rata share of gain on the transfer of pairs entire interest in the partnership? an interest in a limited partnership that is	artnership assets?		
15 tile parmer disposing as		• • •	· · · · Yes	No
Toodings markery.	i and its in the state is	redularly traded on an artist in	· · · · L Yes	No
		- , on an established	<u> </u>	
Name of transferee (foreign	In Corporation Information (see instruction)	ructions)	···· Yes	No
VI-A (OFFSHOR) Address (including country)	E), LP (THE "PARTNERSH"	TD") 4 id	dentifying number. if	
MADISON AUTHOR			FOREIGNUS	
Country code of country of	E, 23RD FLOOR NEW YORK, incorporation or organization (see instruction)	NY 10021		
	(000 11311 11011	ons)		
Foreign law characterization	(see instructions)	_		
- TAULO P				
s the transferee foreign as-	poration a controlled foreign corporation?			
perwork Reduction Act Notice	see separate inches:			
.000	e soparate instructions.		Yes X No	
.000			Form 926 (Re	v. 12-2008)

Type of property	nformation Regar	- 1	(b) Description of	(c) Fair market value on	T-	/41		
Cash	transfer	AŘ	property	date of transfer	- 1	(d) Cost or other basis	(e) Gain recogni	ized on
	2	10		264,45	1.	PARTIE CONTRACTOR	transfe	er .
Stock and						The state of the s	国民 国际人员等	
securities								
Installment				-				
obligations,	<u> </u>						1200 1000000000000000000000000000000000	
account	<u> </u>						-512-20-4	
receivables or								
similar property								-
Foreign currency								
Or Other property								
denominated in								
foreign currency	 				+			
					+			
Inventory					1			
,								
Assots and								
Assets subject to depreciation								
recapture (see								
Temp. Reas sec								
1.367(a)-4T(b))								
Tangible property used in trade or								
Susiness not listed								
inder another								
ategory							3	
tangible								
operty								
operty to be								
ased (as								
Scribed in								
mp. Regs. sec. 367(a)-4T(c))								
perty to be								
d(as ├-								
Cribed in								
np. Regs. sec.								
67(a)-4T(d)) esfers of oil and								
working interests								
lescribed in								
p. Regs. sec.								
7(a)-4T(e))								
-								
r property								
<u> </u>								
								-
plemental Infor	mation Required	To Be R	eported (see instruc		-			_
			(see instruc	tions):				est)

_	Part IV Additional Information Regarding Transfer of Property(see instructions)
9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:
	(a) Refore VAD
	(a) Before VAR % (b) After VAR %
10	Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u>
11	a Gain recognition under section 204(2):
	b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d)
12	
13	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes X No Indicate whether the transferors was a sixty of the transferors.
а	Indicate whether the transferor was required to recognize income under Temporary Regulations sections Tainted property.
b	Tainted property
c d	Didnorioss recapture
4	
	transfer assets which qualify for the trade or business exception under section 2077-1009
5 a	
	If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$
6	Was cash the only property transferred?
	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the
b I	f "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the

(Rev. December 2008) Department of the Treasury Internal Revenue Service

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

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)	die year of the transfer or distribution.	Sequence No. 12
rvaine of paristeror	Identifying number (s	
INDIANAPOLIS MUSEUM OF ART	Identifying number (so 35-0867955	e instructions)
If the transferor was a corporation, complete questions 1a through		
" If the transfer was a section 361(a) or (b) transfer was the transfer		
		s X No
	177	
If not, list the controlling shareholder(s) and their identifying numbe	r(s):	
Controlling shareholder	Identifying number	
c If the transferor was a member of an office		
c If the transferor was a member of an affiliated group filing a consolid corporation?		
If not, list the name and employer identification number (EIN) of the	Yes	No
	parent corporation:	
Name of parent corporation	EIN of parent corporation	
d Have basis adjustments under section 367(a)(5) been made?		
_	Yes	No
2 if the transferor was a partner in a partnership that was the accomplete questions 2a through 2d.	tual transferor (but is not to a	
complete questions 2a through 2d.	total transferor (but is not treated as such under	section 367),
a List the name and EIN of the transferor's partnership:		
Name of partnership	FIN of northern Live	
	EIN of partnership	
h Didu		
b Did the partner pick up its pro rata share of gain on the transfer of par	tnership assets? Yes	
o and partition disposing of its entire interest in the partnershing		No
		∟_ No
		No
art II Transferee Foreign Corporation Information (see instru Name of transferee (foreign corporation)	uctions)	
ASON CAPTTAL LTD	4 Identifying number,	if any
Address (including country)	FOREIGNUS	
10 EAST 59TH STREET, 30TH FLOOR NEW YOR Country code of country of incorporation or organization (see instance)	K NV 10000	
The state of the s	ons)	
<u>U</u>	•	
Foreign law characterization (see instructions)		
DRPORATION Is the transferre ferries and the transferre		
is the transferee foreign corporation a controlled foreign corporation? Paperwork Reduction Act Notice, see separate instructions.	X Yes	No
see separate instructions.		(Rev. 12-2008)

Type of property Cash	Ormation Regarding To	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other	(e)
	VAR	《有题》的图像是是《音乐》	1,000,000.	basis	Gain recognized of transfer
Stock and securities				24.50	
Installment obligations, account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b))					
Tangible property					
used in trade or business not listed under another category					
Intangible property					
Property to be eased (as described in Femp. Regs. sec. 1.367(a)-4T(c))					
Property to be old (as escribed in emp. Regs. sec.					
ansfers of oil and					
as working interests s described in emp. Regs. sec. 367(a)-47(e))					
her property					
pplemental Inform	ation Required To Be F	Reported (see instructi	ions):		

Form to the	
Form 926 (Rev. 12-2008)	
Part IV Additional Information Regarding Transfer of Property (see instructions) 9 Enter the transferor's interest in the ferricular transfer of Property (see instructions)	Pag
merces in the foreign transferee corporation before and after the transfer	
(a) Before <u>0.00</u> % (b) After <u>0.09</u> %	
10 Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u>	
11 Indicate whether any transfer	
b Gain recognition under parties and the control of	
b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 987 12 Did this transfer result from a charge.	Yes X No
Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	Yes X No
13 Indicate whether the transferor was required to	Yes X No
1.367(a)-4T through 1.367(a)-6T for any of the following:	
a Tainted property b Depreciation recapture c Branch loss recapture d Any other income recognition provision contained in the above-referenced regulations	Yes X No Yes X No Yes X No
Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?	
15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations	Yes X No
section 1.367(a)-1T(d)(5)(iii)?	Yes X No
Was cash the only property transferred?	
transaction?	Yes No
transaction?	
b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the	Yes X No

(Rev. December 2008) Department of the Treasury Internal Revenue Service

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

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	n for the year of the transfer or distribut	tion.	Attachment Sequence No. 12
		Idontif	
INDIANAPOLIS MUSEUM OF ART		Identifying number (se	ee instructions)
a If the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer was a section 361(a) or (b) transfer was the transfer was a section 361(a) or (b) transfer was the transfer was a section 361(a) or (b) transfer was the transfer was a section 361(a) or (b) transfer was the transfer was a section 361(a) or (b) transfer was the transfer was a section 361(a) or (b) transfer was the transfer was a section 361(a) or (b) transfer was the transfer was a section 361(a) or (b) transfer was a section 361(a) or (b) transfer was the transfer was a section 361(a) or (b) or	sferor controlled (under section 3	35-0867955 68(c)) by	
b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identificing and	•••••	Ye:	s X No
If not, list the controlling shareholder(s) and their identifying nur	mber(s):	X Yes	s No
Controlling shareholder	ldent	ifying number	
c If the transferor was a member of an affiliated group filing a conscorporation?			
corporation?	olidated return, was it the parent		
corporation? If not, list the name and employer identification number (EIN) of the	00 nommb	Yes	No
Name of parent corporation	le parent corporation:		NO
	EIN of pare	ent corporation	
d Have basis adjustments under section 367(a)(5) been made? .			
		· · · · Yes	No
If the transferor was a partner in a partnership that was the complete questions 2a through 2d.	make-1 4	· · · · · · L	LNo
complete questions 2a through 2d.	actual transferor (but is not tre	ated as such under	section 367).
a List the name and EIN of the transferor's partnership:			,
Name of partnership			
	EIN of p	partnership	
Did the partner pick up its pro rata share of gain on the transfer of positive partner disposing of its partner interest in the	Partnership assets?		
Is the partner disposing of its entire interest in the partnership?	assets?	· · · · Yes	No
" TO UTO PORTUTO UISDOSIDO OF AN Interest in a limitary	regularly traded on an establish	····· L Yes	∟ No
securities market?	••••••••••••••••••••••••••••••••••••••	.а Г	<u></u>
Name of transferee (foreign corporation)	tructions)	Yes	No
NTA ASTA LONG SHOPE TIME	4	Identifying number, i	if any
6-12-1 MINAMI ACVAN	IN MININES	FOREIGNUS	
KYO JA	MINATO KO		
Country code of country of incorporation or organization (see instruc	ctions)		
	•		
Foreign law characterization (see instructions) RPORATION			
Is the transferee foreign company	·		
Is the transferee foreign corporation a controlled foreign corporation? aperwork Reduction Act Notice, see separate instructions.	· · · · · · · · · · · · · · · · · · ·	V ₂ 1,1	
see separate instructions.		Yes X N	0
1.000		rom 926 (F	Rev. 12-2008)

property	(a) Date of transfer		(b) Description of	y (see instructions		(d)	
Cash		VAR	property	Fair market val	fer	(d) Cost or other basis	(e) Gain recognized on
24				1,000	,000.	AND SERVICE AND ADDRESS OF THE PARTY OF THE	transfer
Stock and securities							
Installment							
obligations, account							1
receivables or similar property							
Foreign currency or other property denominated in							
foreign currency							
Inventory	71						
Assets subject to depreciation							
recapture (see							
1.367(a)-4T(b)) Tangible property used in trade or							
business not listed under another							
category							
Intangible property							
Property to be					_		
eased (as							
emp. Regs. sec. .367(a)-4T(c))					-		
roperty to be							
escribed in emp. Regs. sec. 367(a)-4T(d))							
ansfers of oil and s working interests				2			
mp. Reas. sec							
67(a)-4T(e))							
ner property							
pplemental Infor	nation Required	To Be R	eported (see instr	Uctions):			
			\- 20 mou			-	

Form 926 (Rev. 12-2008)	
Part IV Additional Information Regarding Transfer of Property(see instructions) 9 Enter the transferor's interest in the facility of the faci	Page
9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer:	
(a) Before 0 . 0 0	
(a) Before <u>0.00</u> % (b) After <u>0.35</u> %	
Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u>	
11 Indicate whether any transfer reports to a	
a Gain recognition under section 904(f)(3)	
D Gain recognition under any the second seco	. []
b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 987	
d Exchange gain under section 987 12 Did this transfer result from a change in the	
12 Did this transfer as the	
Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes	es LAINO
Indicate whother the state of a foreign corporation?	S X No
1.367(a) 4T through 4 come was required to recognize income under T	S LAINO
Indicate whether the transferor was required to recognize income under Temporary Regulations sections a Tainted property	
b Depreciation recenture	
a Tainted property b Depreciation recapture c Branch loss recapture d Any other income recognition provision provisi	s X No
d Any other income recognition	
Yes	S X No
Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes	X No
dualify for the trade or business exception, under pasting assets which	E.
a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations	X No
section 1.367(a)-1T(d)(5)(iii)?	
Regulations	
section 1.367(a)-1T(d)(5)(iii)?	X No
b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$	
-	
vvas cash the only property transferred?	
Was cash the only property transferred?	
Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the	∟_ No
transaction?	
If "Vee " decar".	☑
If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the	No لما
that was transferred as a result of the	

(Rev. December 2008)

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

Department of the Treasury Internal Revenue Service	to a For	eign Corporation	erty	OMB No. 1545-0
Part I U.S. Transf	Attach Ac	turn for the year of the transfer or distribut		
Name of transferor	(another model of 18	Tanote of distribution	tion.	Attachment Sequence No. 1
INDIANAPOLIS	MUSEUM OF ART		Identifying number (
			Identifying number (s	see instructions)
a if the transfer was a	section 361(a) or (b) transfer was the	ough 1d.	1 93 0007955	
b Did the ter- r	section 361(a) or (b) transfer, was the tracorporations? main in existence after the transfer?	insferor controlled (under section 3	68(c)) by	
	III GYISTANCO Office AL		Ye	s X No
if not, list the control	ling shareholder(s) and their identifying nu		X Ye	
		Imber(s):		SNo
Co	ntrolling shareholder			
		ldenti	ifying number	
			-	
If the transferor was a r	nember of an affiliated group filing a cons			
corporation?	animated group filing a cons	olidated return, was it the parent		
if not, list the name and	employer identification number (EIN) of the	ho normal	<u></u>	
Name o	f parent corporation	ne parent corporation:	· · · · · L Yes	∟_ No
	- parent corporation	EIN		
		EIN of parer	nt corporation	
lave hasis adjustment				
a a a a a a a a a a a a a a a a a a a	under section 367(a)(5) been made? .			
f the transferor was a	Partner in		· · · · Yes	No
complete questions 2a t	brough 2d	actual transferor (but is not)		140
List the name and EIN of	partner in a partnership that was the hrough 2d. the transferor's partnership:	treat	ted as such under s	section 367).
				,
	of partnership			
		EIN of par	tnership	
I the party				
the partner pick up its	pro rata share of gain on the transfer of pairs entire interest in the partnership?			
the partner disposing of	pro rata share of gain on the transfer of pairs entire interest in the partnership? an interest in a limited partnership that is	armership assets?	· · · Yes	la.
Curities marketo	an interest in a limited partnership?	required to	· · · Yes	No
Tarraco mainer.	i maiorip triat is	I COURTY traded	· · Land les	No
ame of transferee (foreign	n Corporation Information (see inst	ructions	· · · · Yes	TNo
IIC OFFSHODE				No
dress (including country)	HCLAND	4 Ide	entifying number, if a	any
F. TOWN CDANS	OGLAND HOUSE, S CHI	IDCII on	URETONIIC	
untry code of country of i	CAYMAN CJ KY-1104 ncorporation or organization (see instruction)	JRCH ST PO BOX 309	GT	
•	organization (see instructi	ons)		
reign law characterization	(see instructions)			
או מטעביי				
ne transferee foreign com	poration a controlled foreign corporation?			
work Reduction Act Notice,	see separate instructions		Von last	
			Yes X No	
			Form 926 (Rev	^{7.} 12-2008)

property	rmation Regarding Tra (a) Date of transfer	(b) Description of	(c)	(d)	
Cash	C 637	property	Fair market value on date of transfer	Cost or other basis	(e) Gain recognized transfer
Stock and securities			1,300,814.		*
Installment obligations, account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation ecapture (see Femp. Regs. sec. 1.367(a)-4T(b))					
angible property sed in trade or usiness not listed nder another ategory					
tangible operty					
operty to be seed (as scribed in mp. Regs. sec. 67(a)-47(c))					
perty to be d (as cribed in pp. Regs. sec. 67(a)-4T(d))					
sfers of oil and working interests escribed in D. Regs. sec. ((a)-4T(e))					
r property					
plemental Informat	tion Required To Be Re	eported (see instruction	ions):		

	-		
Form	926	(Rev.	12-2008

	Part IV Additional Information Regarding Transfer of Property (see instructions) 9 Enter the transferor's interest in the foreign transfer.
	9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before VAD
	(a) D. (a) D. (b) D. (c) D. (c
	(a) Before <u>VAR</u> % (b) After <u>VAR</u> %
	10 Type of papears in
	Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u>
1	Indicate whether any transfer
	1 Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3)
	D Gain recognition underseasity
	b Gain recognition under section 904(f)(3) c Recapture under section 1503(d) d Exchange gain under section 987
	c Recapture under section 904(f)(5)(F) d Exchange gain under section 987 Did this transfer result from a change in the
12	Did this transfer result from a disconnection of the second control of the second contro
	Did this transfer result from a change in the classification of the transferon to the transferon to the classification of the classification of the transferon to the classification of the cl
13	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes X
	1.367(a)-4T through 1.307(a) was required to recognize income under T
	a Tainted property
	Tainted property Depreciation recapture Branch loss recapture Any other income recognition provision contained in the second sections and the following: Yes X N
	Branch loss recapture
	Yes V a
4	Did the transfer assets which and it is
	quality for the trade or business and the
5 a	Did the transfer foreign goodwill or going concern value as defined in Temporary Regulations
	section 1.367(a)-1T(d)(5)(iii)?
ь	section 1.367(a)-1T(d)(5)(iii)?
_	If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value Yes No transferred ▶ \$
i	Was cash the only property transferred?
	, report dansierled.
а	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the
	transaction?
)	transaction?
1	ransaction:
_	f "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the

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(Rev. December 2008)

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

Department of the Treasury Internal Revenue Service		eign Corporation	OMB No. 15
Part I U.S. Transfer Name of transferor	or Information (see instructions)	urn for the year of the transfer or distributi	ion. Attachment
TNDTAMADOT			Sequence N
INDIANAPOLIS N	MUSEUM OF ART		Identifying number (see instruction
		nuch 4.1	35-0867955
5 Or fewer domest.	(b) hallster, was the train	Deformer and the	339,733
b Did the transferor row	ection 361(a) or (b) transfer, was the train progrations? ain in existence after the transfer? g shareholder(s) and their identifying pur	risieror controlled (under section 36	68(c)) by
			Yes XN
	g shareholder(s) and their identifying nu	mbor(a)	···· X Yes
		mber(s):	()N
	olling shareholder		
		Identif	ying number
		146	
O If the I			
trie transferor was a me	mber of an affiliated group filing a conso		
If not line !!	nployer identification pour	olidated return, was it the parent	
in not, list the name and er	nployer identification number (EIN) of the	De parent company	<u> </u>
Name of n	arent corporation	ne parent corporation:	· · · · Yes No
		EIN of parent	corporation
d Have basis adjustments			
asia dajustinents un	der section 367(a)(5) been made?		
If the transferor was a ne	outher in a partnership that was the a bugh 2d. etransferor's partnership:		Yes No.
complete questions 2a thro	ough 2d	actual transferor (but :-	NO
a List the name and EIN of the	e transferodo	(but is not treate	ed as such under section 367)
			1 557)
	partnership		
		EIN of part	nership
b Did the partners :			
Is the partner pick up its pro	Prata share of gain on the transfer of pa		
Is the partner disposing of its	entire interest in the partnership?	artnership assets?	Yes No.
securities markets	interest in a limited partnership that is	omula d	Yes No
rt II Transferee Foreign	entire interest in the partnership? interest in a limited partnership that is r	egulany traded on an established	les LNo
Name of transferee (foreign a	Corporation Information (see insta	······································	· · Yes No
	priporation)		
PMRLANT DYDUMEDS	TIMES		43.0
Address (including country)		4 Ider	itifying number, if any
Address (including country) MANA RAY CRAND	C/O CITCO FUND SERVI	CDC	ntifying number, if any OREIGNUS
Address (including country) MANA RAY CRAND	C/O CITCO FUND SERVI	CDC	DRETCMIIC
Address (including country) MANA BAY GRAND CA Country code of country of income.	C/O CITCO FUND SERVI YMAN CJ KY1-1205 Orporation or organization (see instruction	CDC	DREIGNUS CUS WAY, PO BOX 3
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EMBLANT PARTNERS Address (including country) MANA BAY GRAND CA Country code of country of inco Foreign law characterization (so	C/O CITCO FUND SERVI YMAN CJ KY1-1205 Orporation or organization (see instruction see instructions)	CDC	DRETCMIIC

Cash VAR Description of property Cash VAR 1, 000, 000 Stock and securities Installment obligations, account receivables or similar property Foreign currency or other property denominated in foreign currency Inventory Inventor	Cost or other basis	Gain recognized of transfer
Sicock and Securities Installment obligations, account receivables or receivable	Dasis	transfer
Installment obligations, account receivables or similar property Foreign currency or other property denominated in foreign currency linventory Inventory Assets subject to depreciation recepture (see Termp. Regs. sec. 1,357(a)-47(b)) Tangible property used in frade or business not listed under another category Intangible property to be asset (as esscribed in emp. Regs. sec. 367(a)-47(c)) Toporty to be asset (as esscribed in emp. Regs. sec. 367(a)-47(d)) Tangible property to be asset (as esscribed in emp. Regs. sec. 367(a)-47(d)) Tangible property to be asset (as esscribed in emp. Regs. sec. 367(a)-47(d)) Tangible property to be asset (as esscribed in emp. Regs. sec. 367(a)-47(d)) Tangible property to be asset (as esscribed in emp. Regs. sec. 367(a)-47(d)) Tangible property to be asset (as esscribed in emp. Regs. sec. 367(a)-47(d)) Tangible property to be asset (as esscribed in emp. Regs. sec. 367(a)-47(d)) Tangible property to the property the property to the property the property the property to the property the property the property the property to the property the property to the property the prope		
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Dusiness not listed under another eategory Intangible reporty to be assed (as secribed in emp. Regs. sec. 367(a)-4T(c)) Disperty to be do (as secribed in emp. Regs. sec. 367(a)-4T(d)) Disperty to be do (as secribed in emp. Regs. sec. 367(a)-4T(d)) Disperty to be do (as secribed in emp. Regs. sec. 367(a)-4T(d)) Disperty to be do (as secribed in emp. Regs. sec. 367(a)-4T(d)) Disperty to be do (as secribed in emp. Regs. sec. 367(a)-4T(d)) Disperty to be do (as secribed in emp. Regs. sec. 367(a)-4T(d))		
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scribed in imp. Regs. sec. 367(a)-4T(c)) Deperty to be d (as scribed in mp. Regs. sec. 67(a)-4T(d)) insfers of oil and working interests described in p. Regs. sec.		
Deperty to be d (as scribed in mp. Regs. sec. 67(a)-4T(d)) Insters of oil and working interests described in p. Regs. sec.		
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working interests described in p. Regs. sec		
described in p. Regs. sec		
p. Reas. sec		
/(a)-4T(e))		
r property		
plemental Information Required To Be Reported (see instructions):		
(See Instructions):		

Form 926 (Rev. 12-2008) Additional Information Regarding Transfer of Property(see instructions) 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before VAR % (b) After <u>VAR</u> % Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u> Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 987 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes X No Indicate whether the transferor was required to recognize income under Temporary Regulations sections a Tainted property c Branch loss recapture d Any other income recognition provision contained in the above-referenced regulations Yes Yes Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes X No 15 a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the

(Rev. December 2008)

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

Department of the Treasury Internal Revenue Service	to a For	reign Corporation	,	OMB No. 1
Part I U.S. Transfe	Attach to your income tax re	turn for the year of the transfer or distribut		
Name of transferor		ansier or distribut	ion.	Attachmer Sequence
_INDIANAPOLTS	MIISPIM OF T		T	
		<u> </u>	identifying number (s	ee instruction
a If the transfer was a	section 361(a) or (b)	ough 1d.	L33-0867955	
5 or fewer domestic	was the tra	ansferor controlled (under another a		157.55
			38(c)) by	
If not, list the controlli	na characterize after the transfer?	**************	Yes	X
	ng shareholder(s) and their identifying nu	umber(s)	Yes	
				<u> </u>
	trolling shareholder			
		Identif	fying number	
c If the transferor was	ember of an affiliated group filing a cons			
COMOration2	ember of an affiliated group filing a cons			
if not the u	- 5. out ming a cons	olidated return, was it the parent		
Thot, list the name and e	employer identification number (TIA)	homan	<u> </u>	
Name of	employer identification number (EIN) of the	ne parent corporation:	····· L Yes	∐ No
332.110 01	parent corporation			
		EIN of paren	t corporation	
d Have book and				
- Have basis adjustments u	nder section 367(a)(5) been made?			
If the transferor	, , , , , , , , , , , , , , , , , , ,			
complete questions as it	partner in a partnership that was the rough 2d. The transferor's partnership:	Debugh 4	···· res	No
a List the name and Fix	rough 2d.	actual transferor (but is not treate	ed as such under a	••
a List the name and EIN of the	ne transferor's partnership:		- as sach under se	ection 36
Name o	of partnership			
		FIN of many		
		EIN of part	nership	
Did the partner pick up its				
Is the partner disposing of	ro rata share of gain on the transfer of pa	artnombii		
			· · · Yes	1
securities market?	n interest in a limited partnership that is	rogulad	HV	No
tll Transfered Forsi	s entire interest in the partnership? n interest in a limited partnership that is i	egularly traded on an established	· · · L Yes	_ No
Name of transferee (foreign	Corporation Information (see inct.	Cuoties .	· · · · Yes	٦
A EARLY SECONDAR	corporation)		E-E-E	No
A EARLY SECONDAR Address (including country)	Y FUND IV, LP	4 Ide	ntifying number, if ar	214
HELTED TEDORES	PO BOX 87, 22 GRENTY	FT T T	OREIGNUS	ıy
Country code of country of in	A JE4 8PX	THE STREET	==31100	
	X JE4 8PX corporation or organization (see instruction)	ons)		
Foreign law characterization (coo in t			
s the transferee forcier	ration a controlled foreign corporation?			
perwork Reduction Act Notice, s	ration a controlled foreign corporation?			
	ee separate instructions.		Yes X No	
.000				
			Form 926 (Rev.	12-2008

Part III	Information Regarding	Transfer of Property (see instructions)
Type of	(a)	ransier of Property (see instructions)

property	l D	(a) ate of ansfer	(b) Description of	(c)		(4)	
Cash		VAR	property	Fair market value date of transfe	er	(d) Cost or other basis	(e) Gain recognized o
Stock and securities				583,	911.	A STATE STATE OF THE STATE OF T	transfer
Installment obligations,							
account	ļ						
receivables or				-			
similar property				- · 			
Foreign currency							
or other property denominated in							
foreign currency							
Inventory							
vernory							
Assets subject to							
depreciation	ļ						
recapture (see Temp. Regs. sec.							
1.367(a)-4T(b))							
Tangible property used in trade or							
DUSIDESS not lietod							
Inder another category							
					-		
ntangible roperty					-		
Operty					+		
roperty to be							
ased (as ⊢							
escribed in emp. Regs. sec.					 		
207(a)-4T(c))					 		
operty to be					 		
Scribed in					1		
mp. Regs. sec. 67(a)-4T(d))							
rsfers of oil and							
working interests described in							
p. Regs. sec							
7(a)-4T(e))							
-							
r property							
plamant							
piemental Infori	nation Requi	red To Be Re	eported (see instru	otio \			
				Suons):			

ЗA

Form 926 (Rev. 12-2008) Additional Information Regarding Transfer of Property(see instructions) Part IV 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before <u>0.00</u> _____ % **(b)** After <u>0.36</u> _____ % Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u> Indicate whether any transfer reported in Part III is subject to any of the following: 11 a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) d Exchange gain under section 987 Yes Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes X No Indicate whether the transferor was required to recognize income under Temporary Regulations sections 13 c Branch loss recapture d Any other income recognition provision contained in the above-referenced regulations Yes Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes X No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the

b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the

(Rev. December 2008) Department of the Treasury Internal Revenue Service

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

	tay notices and		
Part I U.S. Transferor Information (see instruction	tax return for the year of the transfer or distribution. Attachm		
	ONS) Sequen		
INDIANAPOLIS MUSEUM OF ART	Identifying		
" SIC URISHIOF WAS A SEC. "	ldentifying number (see instruction of the second s		
a If the transferor was a corporation, complete questions 1a through 1d. 5 or fewer domestic corporations? b Did the transferor remain in existence after the transfer?			
5 or fewer domestic	the transfers, and an		
b Did the transferor remain in existence at	turidel section 368(c)) by		
b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identificity.	Yes X		
If not, list the controlling shareholder(s) and their identifyi	ing number(s):		
Controlling shareholder			
	Identifying number		
c If the transferor was a member of an affiliated group filing a corporation?			
corporation?	COnsolidated mtu-		
If not, list the name and employer identification number (EIN	return, was it the parent		
met the name and employer identification number (EIN	1) of the parent corporation:		
Name of parent corporation	y) or the parent corporation:		
	EIN of parent corporation		
	EIN of parent corporation		
d Have basis adjustments under section 367(a)(5) been made?	?		
d Have basis adjustments under section 367(a)(5) been made?	?		
d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 30 through 15 th	?		
d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 30 through 15 th	?		
d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 2a through 2d. a List the name and EIN of the transferor's partnership:			
d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 30 through 15 th	?		
d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 2a through 2d. a List the name and EIN of the transferor's partnership:	?		
d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 2a through 2d. a List the name and EIN of the transferor's partnership: Name of partnership	?		
d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 2a through 2d. a List the name and EIN of the transferor's partnership: Name of partnership	?		
d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 2a through 2d. a List the name and EIN of the transferor's partnership: Name of partnership Did the partner pick up its pro rata share of gain on the transferors is the partner disposition.	? Yes No the actual transferor (but is not treated as such under section 3 EIN of partnership		
d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 2a through 2d. a List the name and EIN of the transferor's partnership: Name of partnership b Did the partner pick up its pro rata share of gain on the transfer is the partner disposing of its entire interest in the partnership	?		
d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 2a through 2d. a List the name and EIN of the transferor's partnership: Name of partnership Did the partner pick up its pro rata share of gain on the transfer is the partner disposing of its entire interest in the partnership the securities market?	?		
d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 2a through 2d. a List the name and EIN of the transferor's partnership: Name of partnership Did the partner pick up its pro rata share of gain on the transfer is the partner disposing of its entire interest in the partnership the securities market?	?		
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d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 2a through 2d. a List the name and EIN of the transferor's partnership: Name of partnership b Did the partner pick up its pro rata share of gain on the transferor is the partner disposing of its entire interest in the partnership is the partner disposing of an interest in a limited partnership the securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) XII-A CHARLIE AIV LP	the actual transferor (but is not treated as such under section 3 EIN of partnership To of partnership assets? Yes No N		
d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was complete questions 2a through 2d. a List the name and EIN of the transferor's partnership: Name of partnership b Did the partner pick up its pro rata share of gain on the transfer is the partner disposing of its entire interest in the partnership is the partner disposing of an interest in a limited partnership the securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) XII-A CHARLIE AIV LP Address (including country) C/O WALKERS SPV LONGER. TOWN CRANS	the actual transferor (but is not treated as such under section 3 EIN of partnership r of partnership assets? Property of the actual transferor (but is not treated as such under section 3 EIN of partnership Yes No No No No Property of the actual transferor (but is not treated as such under section 3		
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property	(a) Date of transfer	(b) Description of	(c) Fair market value on	(d)	
Cash	VAR	property	date of transfer	Cost or other basis	(e) Gain recognized of
Stock and securities			733,000.		transfer
Installment					
obligations, account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation recapture (see Temp. Regs. sec.					
1.367(a)-47(b)) Tangible property used in trade or pusiness not listed under another					
ategory atangible roperty					
operty to be ased (as scribed in mp. Regs. sec.					
67(a)-4T(c)) perty to be d (as cribed in					
np. Regs. sec. 57(a)-4T(d)) sfers of oil and					
working interests escribed in p. Regs. sec. (a)-4T(e))					
r property					
plemental Information	n Required To Be Re	ported (see instruction	ons).		

Form 926 (Rev. 12-2008) Additional Information Regarding Transfer of Property(see instructions) Part IV Page 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before VAR ______ % **(b)** After <u>VAR</u> _____ % Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u> Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes X No Indicate whether the transferor was required to recognize income under Temporary Regulations sections a Tainted property c Branch loss recapture **d** Any other income recognition provision contained in the above-referenced regulations Yes Yes 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes X No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the

(Rev. December 2008)

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

Department of the Treasury	10 4 1 016	righ Corporation	erty	OMB No. 15
Internal Revenue Service Part I U.S. Transfe	Attach to your income tax return income tax retu	rn for the year of the transfer or distribut	ion	
Name of transferor	10110113)	- Coulding	ion,	Attachment Sequence N
1 If the transfer	MUSEUM OF ART		Identifying number (s	
			35-0867955	ee instruction
5 or fewer days a	section 361(a) or (b) transfer, was the transfer.	ugh 1d.		
b Did the transformer	a corporation, complete questions 1a throis section 361(a) or (b) transfer, was the trancorporations? nain in existence after the transfer?	steror controlled (under section 36	8(c)) by	
			Yes	S XN
	ing shareholder(s) and their identifying nun	phor(a)	Yes	<u> </u>
		iber(s):		
Con	trolling shareholder			
		Identii	ying number	ii.
-				
c If the to				
Corporations	ember of an affiliated group filing			
If not line the	nember of an affiliated group filing a consol	idated return, was it the parent		
n not, list the name and e	employer identification number (EIN) of the	naront com	Γ.,	
Name of	parent corporation	parent corporation:	· · · · L Yes	∟ No
		EIN as -		
		EIN of paren	corporation	
d Have basis adjustments	under section 367(a)(5) been made?			
, , , , , , , , , , , , , , , , , , , ,	inder section 367(a)(5) been made?			
If the transferor was a r	Partner in a post-		· · · · Yes	No
Complete	" a partnership that was the ac	Maria -		
Complete questions 2a th	rough 2d	Rual transferor (but is not trans-		
List the name and EIN of the	he transferor's partnership.	ctual transferor (but is not treate	ed as such under se	ection 367
	partner in a partnership that was the acrough 2d. the transferor's partnership:	cual transferor (but is not treate	ed as such under se	ection 367
	rough 2d. he transferor's partnership: of partnership			ection 367
		elN of part		ection 367
Did the partner pick up the	of partnership	EIN of part		ection 367
Did the partner pick up its p	oro rata share of gain on the transfer of por	EIN of part		ection 367
Did the partner pick up its p Is the partner disposing of it	or or rata share of gain on the transfer of parts entire interest in the partnership?	EIN of part	nership	
Did the partner pick up its p Is the partner disposing of it Is the partner disposing of a securities market?	or orata share of gain on the transfer of parts entire interest in the partnership?	EIN of part	nership	No
Did the partner pick up its p Is the partner disposing of it Is the partner disposing of a securities market?	or orata share of gain on the transfer of parts entire interest in the partnership?	EIN of part	nership	
Did the partner pick up its p Is the partner disposing of it Is the partner disposing of a securities market? Il Transferee Foreign Name of transferee (feeting)	of partnership oro rata share of gain on the transfer of parts ts entire interest in the partnership? on interest in a limited partnership that is re	EIN of part	nership	No No
Did the partner pick up its p Is the partner disposing of it Is the partner disposing of a securities market? Transferee Foreign Name of transferee (feeting)	of partnership oro rata share of gain on the transfer of parts ts entire interest in the partnership? on interest in a limited partnership that is re	EIN of part tnership assets? gularly traded on an established	nership Yes Yes Yes	No No No
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Did the partner pick up its p Is the partner disposing of it Is the partner disposing of a securities market? II Transferee Foreign Name of transferee (foreign of transferee (foreign of transferee) NROCK GLOBAL PA Address (including country) D TOWN TORTOLA Country code of country of incoming law characterization (MPTED COMPANY	or or rata share of gain on the transfer of parties entire interest in the partnership? in interest in a limited partnership that is respectively. In Corporation Information (see instruction) RTNERS (B.V.I.), INC MAPLES AND CALDER KI VI 00000 corporation or organization (see instruction) (see instructions)	tnership assets? gularly traded on an established ctions) 4 Idee	nership Yes Yes Yes Yes	No No No

Type of property Cash	Ormation Regarding Tra	Description of	(c)	(d)	
Casii	VAR	property	date of transfer	Cost or other basis	(e) Gain recognized
Stock and securities			1,000,000.		transfer
Installment obligations, account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b))					
Tangible property used in trade or business not listed under another category					
ntangible roperty					
roperty to be ased (as escribed in emp. Regs. sec. 367(a)-4T(c))					
operty to be d (as scribed in mp. Regs. sec. 67(a)-47(d))					
nsfers of oil and working interests lescribed in p. Regs. sec. 7(a)-4T(e))					
r property					
plemental Informat	ion Required To Be Re	ported (see instruction			
		AON STREET	is):		W77-2009-W77-W

Form 926 (Rev. 12-2008) Part IV Additional Information Regarding Transfer of Property(see instructions) 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before VAR _____ % **(b)** After <u>VAR</u> ____ % Type of nonrecognition transaction (see instructions) ► <u>SECTION 351</u> Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) d Exchange gain under section 987 Yes ******************************* Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes X No Indicate whether the transferor was required to recognize income under Temporary Regulations sections a Tainted property c Branch loss recapture **d** Any other income recognition provision contained in the above-referenced regulations Yes Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes X No 15 a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 16 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the

b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the

Form 0886 (Rev. March 2011) Department of the Treasury	Reportable Transaction Disclosure Statement	1
ITIEMA Revenue Casa to	Attach to voil tay notion	OMB No. 1545-1
Name(s) shown on return (individuals are	See separate instructions	Attachment
INDIANAPOLIS MUSE		Sequence No. 1
		Identifying number
4000 MICHIGAN ROAD	City or town	35-0867955
A If you are filing more than one F	INDIANAPOLIS Form 8886 with your tax return, sequentially number	State ZIP code
each Form 8886 and enter the s	statement number for this Form 8886	IN 46208
Eiller the form number of the tox	mission to this Form 8886	
Enter the year of the tax return in	dentified above	1. of
Is this Form 8886 being filed with	Tan amondod	· · · ▶ <u>990</u>
C Check the house at	n an amended tax return?	··· ▶ <u>2011-06</u>
DUX(ES) Inst apply /	e instructione)	· · · ▶ Yes X
or reportable transaction	""uai year filer	
SECTION 988 LOSSE		
1b Initial year participated in transact 2010		
4010	To Reportable transmit	
defility the type of reportable trans	saction. Check all boxes that apply (see instructions).	see instructions)
a Listed c	Contract at apply (see instructions).	
b Confidential d		
If you participated in this reportal provide the information below for the	the published guidance number for the listed transaction or transaction bistantially similar transactions reported on this form ble transaction through a partnership, S corporation, trust, and foreign entity, on the entity(s) (see instructions). (Attach additional sheets, if necessary.)	. • 1
a Type of entity	X Partnership Trust Trust Trust	check the applicable boxes ar
	S composition X Partnership	Trust
Name	S corporation	
Employer identification number (EIN) known	if POMONA CAPTUAL TITE	1 Oreign
	AIF V FIID	O HOLDINGS, LP
Date Schedule K-1 received from enti	N	
	98-040911	3
Enter heles as	· · · ▶	
promoted solicited and address	of each individual or antit	
sheets, if necessary)	d your participation in the transport you paid a fee with regard to	
Name	of each individual or entity to whom you paid a fee with regard to the transaction or provided tax advice related to the transaction.	on if that individual or entity
		ansaction. (Attach additional
Number, street, and room or suite no.		ees paid
	City or town \$	l- and
Name		State ZIP code
		State ZIP code
Number, street, and room or suite no.	Identifying number (if known) Fe	es paid
and room or suite no.	City or town	paid
	19	a
		State ZIP code

Form 8886 (Rev. 3-2011)				
7 Facts				
a Identify the type o	of tax benefit generated by the	transaction or		
\Box	, 010	transaction. Check all the	boxes that apply (see instruc-	ctions)
	Exclusions from g			
Capital loss		Facin I I	Absence of adjustments to ba	osia
- Ordinary loss	L Adiustes	F(L	Jeierrai	- Ex Oreans
b Further describe t		(Other	s generated by the transaction for all
years. Include fact	s of each step of the	e expected tax treatmen	t and over the	
include in your de	scription your participation	ction that relate to the e	xpected tax benefits	s generated by the transaction for the
ATTACHMENT	a description of any tax result 1	in the transaction and a protection with respect t	Il related transactions regan o the transaction.	s generated by the transaction for all ng the amount and nature of your involutions dless of the year in which they were
8 Identify all individua instructions). Include	ls and entities involved in their name(s), identifying	the transaction that ar	e tax-exempt foreign	elated. Check the appropriate box(es their involvement, For each feeting
		number(s), address(es), . For each individual or	and a brief description of related entity, explain how	elated. Check the appropriate box(es their involvement. For each foreign of the individual or entity is related. A
a Type of individual or ea	ofite			or criticy is related. A
Name	Tax-exen	npt Foreign	Related	
A 11		E .	T	
Address				Identifying number
Description				
 Type of individual or entitle 	, [-]			
b Type of individual or entity	r: Tax-exempt	Foreign		
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と Type of individual or entity ame	r: Tax-exempt	Foreign	Related	Identifying number
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ம் Type of individual or entity ame ldress	r: Tax-exempt	Foreign	Related	Identifying number

Internal Revenue Service Name(s) shown on return (individual)	- Auach to yo	n Disclosure Statement our tax return.		OMB No. 1545-18
Name(s) shown on return (individuals enter la: INDIANAPOLIS MUSEUM Number, street, and room or suite.	st name, first name, middle initial)	moductions.		Attachment Sequence No. 13
			Identifying	
4000 MICHIGAN ROAD	City or town		<u> </u>	867955
A If you are filing more than one Form	INDIANAPOL 8886 with your tax return, sequentially n	IS		State ZIP code
each Form 8886 and enter the state B Enter the form number of the tay set	ment number for this 5	number		IN 46208
Enter the form number of the tay set				•
Enter the year of the tax return identi	urn to which this form is attached or relatified above	ed		2. of
is this Form 8886 being filed with an	amended tax return?			990
	100. (CLU)	* * * * * * * * * * * * * * * * * * * *	· · · · · • • <u>•</u>	2011-06
C Check the box(es) that apply (see ins Name of reportable transaction	tructions). Initial year filer		••••	Yes X No
DISPOSITION OF	The state of the s	Protective disclosure		
DISPOSITION OF GMH 1 1b Initial year participated in transaction	HOLDING COMPANY (NC	T.\		
2005	1c Reportable transce	ati-		
2 Identify the type of reportable trans-		エ / ction or tax shelter registration numbe	er (see instruction	One)
a Listed	oneck all boxes that apply (see instr	uctions)		-1.0)
b Confidential c X	Contractual protection e	1 7		
Enter the number of "same as or substa If you participated in this reportable of provide the information below for the entry	ntity(s) (see instructions). (Attach additions)	corporation, trust, and foreign entity onal sheets, if necessary.)	· · · Þ	pplicable hove
	S corporation	Trust X Partners		 7
Name	S corporation	Foreign X Partners	hip	Trust
Name	• • •	Foreign S corpor	hip ation	Trust Foreign
Name	POMONA CAPITAL	Foreign S corpor	hip ation	Trust Foreign
Name Employer identification number (EIN), if known Date Schedule K-1 received 6	POMONA CAPITAL	Foreign X Partners S corpor	hip ation	Trust
Name Employer identification number (EIN), if known Date Schedule K-1 received from entity (enter "none" if Schedule K-1	• • •	Foreign S corpor	hip ation	Trust Foreign
Name Employer identification number (EIN), if known Date Schedule K-1 received from entity (enter "none" if Schedule K-1 not received).	POMONA CAPITAL 26-1701383	Foreign S corpor VII, LP COURT S 13-41512	ation DUARE CA	Trust Foreign APITAL PAR
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a Identify the type of tax benefit generated by the	
a Identify the type of tax benefit generated by the transaction. Check all the boxes that apply (see in	Detructions)
Deductions Evaluation (istructions).
X Capital loss Nonrecognition of gain Absence of adjustments	to havin
Adjustments to besign	Orcaits
b Further describe as	
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Include in your description your participation in the transaction and all related transactions into Also, include a description of any tax result protection with respect to the transaction.	e and the year in which they were e
8 Identify all individuals and entities involved in the transaction that are tax-exempt, foreign, identify its country of incorporation or existence. For each individual or related activities	
instructions). Include their name(s), identifying number(s), address(es), and a brief description additional sheets, if necessary.	Or related to
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Form 8886 (Rev. March 2011) Department of the Treasury Internal Revenue Service	Rep	ortable Transactio	your tax return.	e Statement		OMB No. 1545-18
Name(s) shown on return (individ	luale and a l	See sepa	rate instructions.			Attachment
INDIANAPOLIS	uals enter last name, fin					Sequence No. 13
INDIANAPOLIS M Number, street, and room or suite	USEUM OF A	ART, INC.			Identifying	number
4000 MICHIGAN ROA	: NO.	City or town				867955
		INDIANAPO	OT.TS			State ZIP code
Enter the form number of Enter the year of the tax r	the tax return to whi	n your tax return, sequential aber for this Form 8886 ch this form is attached or re	ly number - · · · · ▶ 5	Statement number		IN 46208
Is this Form 8886 being fil	led with an amended	tax return?	• • • • • • • • • • • • • • • • • • • •	· · · · · · · · · · · · · · · · · · ·	•••• <u> </u>	2011-06
C Check the box(es) that ap 1a Name of reportable transa	ply (see instructions)	. Initial year f	iler Prote	ective disclosure		Yes X N
_SECTION 988 TO	CCEC		1.100	- USCIOSUTE		
1b Initial year participated in to	Capportion					
		1c Reportable tran	nsaction or tax shelte			
Listed Listed Confidential If you checked box 2a or 2e of interest Enter the number of "same a lf you participated in this provide the information below Type of entity Name Employer identification number known	d X Loss c, enter the published as or substantially sin reportable transaction for the entity(s) (s	guidance number for the lis	ted transaction or tra ted transaction or tra on this form S corporation, trust ditional sheets, if ne	>	nip Ition	Trust Foreign
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promoted, solicited, or recon sheets, if necessary.)	nmended your partic	cipation in the transaction	, or provided tax a	dvice related to the	iction if that i	ndividual or entity
Enter below the name and a promoted, solicited, or reconsheets, if necessary.) Name	nmended your partic	cipation in the transaction			transaction.	ndividual or entity (Attach additional
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Form 8886 (Rev. 3-2011)				
7 Facts				Page
a Identify the type of tax benefit gene	rated by the transactio	n. Check all the boxes	that apply (see instruction	s).
Deductions Exc	haisas fara t			
	lusions from gross inco recognition of gain	1 1	ce of adjustments to basis	Tax Credits
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Include in your description your	participation in the tra	i relate to the expect	ed tax benefits including	enerated by the transaction for all affected the amount and nature of your investment. ss of the year in which they were entered
into. Also, include a description of ATTACHMENT 3	any tax result protection	on with respect to the	transaction.	•
manual transfer	av inclinialini liminis	nac (selsselnick (SI)	a host description of t	lated. Check the appropriate box(es) (see their involvement. For each foreign entity, the individual or entity is related. Attach
a Type of individual or entity:	Tax-exempt	Foreign	Related	
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Address				
Description				
b Type of individual or entity:	Tax-exempt	Foreign	Related	
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Description				

SECTION	988	LOSSES
	200	ーレスシンファン

ATTACHMENT 1

FORM 8886 - REPORTABLE TRANSACTION DISCLOSURE STATEMENT

LINE 7: FACTS OF THE TRANSACTION

THE TAXPAYER HAS INVESTED IN THE UNDERLYING PARTNERSHIP IDENTIFIED IN LINE 5. THE PARTNERSHIP INVESTS IN FIXED INCOME AND EQUITY SECURITIES. THE PARTNERSHIP, FROM TIME TO TIME, WILL ENGAGE IN SPOT, FORWARD, AND OPTION CONTRACTS TO HEDGE ITS FOREIGN CURRENCY INVESTMENTS. DURING 2005, THE PARTNERSHIP ENTERED INTO A CURRENCY OPTION (THE "OPTION") AS A HEDGE AGAINST CURRENCY FLUCTUATION FOR ONE OF ITS PORTFOLIO INVESTMENTS DENOMINATED IN EUROS. UPON TERMINATION SEE STATEMENT 1.

FORM 8886, PAGE 2 DETAIL

LINE 7B - EXPECTED TAX BENEFITS

OF THE OPTION IN 2010, THE PARTNERSHIP REALIZED A LOSS. THE TAXPAYER IS DEEMED TO HAVE PARTICIPATED IN THIS LOSS TRANSACTION BY VIRTUE OF BEING A PARTNER IN THE PARTNERSHIP. ACCORDINGLY, THE TAXPAYER IS REPORTING ITS SHARE OF THE LOSS TRANSACTION. THE TAXPAYER'S EXPECTED TAX BENEFIT FROM THIS TRANSACTION IS AN ORDINARY LOSS PURSUANT TO IRC SECTION 988.

DISPOSITION	OF	CMH	HOTDING	COMPANY	/NOT
DISCOSTITON	Or	GMH	HOPDING	COMPANY	(NCI)

ATTACHMENT 2

FORM 8886 - REPORTABLE TRANSACTION DISCLOSURE STATEMENT

LINE 7: FACTS OF THE TRANSACTION

THE PARTNERSHIP INVESTED IN AN UNDERLYING PARTNERSHIP THAT HAD A SECTION 165 LOSS DURING 2010. THIS TRANSACTION IS PART OF THE UNDERLYING PARTNERSHIP'S REGULAR TRADING ACTIVITIES AND, THEREFORE, IS NOT CARRIED OUT AS PART OF ANY PLAN TO ACHIEVE TAX BENEFITS. AS A RESULT, THERE ARE NO EXPECTED TAX BENEFITS. THE REALIZED LOSS ON THE IRC SECTION 165 TRANSACTIONS ALLOCATED TO US IS IN CONNECTION WITH THE UNDERLYING PARTNERSHIP'S INVESTMENT ACTIVITIES AND, THEREFORE, SEE STATEMENT 2.

FORM 8886, PAGE 2 DETAIL

LINE 7B - EXPECTED TAX BENEFITS -----

NOT INTENDED AS PART OF ANY PLAN TO ACHIEVE TAX BENEFITS. THE PARTNERSHIP CANNOT CONFIRM THAT THE LOSS MEETS ANY OF THE SPECIFIED EXEMPTIONS PROVIDED IN REV. PROC. 2004-65. THE PARTNERSHIP IS FILING THIS FORM ON A PROTECTIVE DISCLOSURE BASIS FOR THE REASONS LISTED

ATTACHMENT 3

FORM 8886 - REPORTABLE TRANSACTION DISCLOSURE STATEMENT

LINE 7: FACTS OF THE TRANSACTION

THE TAXPAYER INVESTED IN THE UNDERLYING PARTNERSHIP IDENTIFIED IN LINE 5 THAT PARTICIPATED IN IRC SECTION 988 LOSSES FROM THE REDEMPTION OF DEBT INSTRUMENTS OF A PORTFOLIO COMPANY. THE TAXPAYER IS DEEMED TO HAVE PARTICIPATED IN THIS LOSS TRANSACTION BY VIRTUE OF BEING A PARTNER IN THE PARTNERSHIP. ACCORDINGLY, THE TAXPAYER IS REPORTING ITS SHARE OF THE LOSS TRANSACTION. THE TAXPAYER'S EXPECTED TAX BENEFIT FROM THIS TRANSACTION IS AN ORDINARY LOSS PURSUANT TO IRC SEE STATEMENT 3.

FORM 8886, PAGE 2 DETAIL

LINE 7B - EXPECTED TAX BENEFITS SECTION 988.