| Form 9 | 90-T | Exem | ot Organization | Business I | ncom | e Tax Return (and | d proxy | tax under secti | on 6033(e)) | OMB N | lo. 1545-0687 |
|---|-------------------------------|------------------|---------------------------------------|--------------------|------------|------------------------|-----------|------------------|-------------|---------------------|--------------------------------------|
| | of the Treasury | _ | _ | | | inning | | | | <u>2</u> | <u> </u> |
| Internal Reve | • | | ending (|)6/30 ,20 0 | 9. | ► See se | parate i | nstructions. | | | Public Inspection Organizations Only |
| Δ 📖 | heck box if ddress changed | | Name of organizatio | n (Check t | oox if nai | me changed and see in | struction | s.) | | yees' trust, see ii | cation number |
| B Exempt | under section | | KENYON CO |)T.T.EGE | | | | | on pag | 0 0., | |
| X 501 | (C)(3) | Print | | | . If a P.O | box, see page 9 of ins | tructions | S. | 31- | 4379507 | |
| 408 | | or Type | | | | | | | E Unre | lated busine | ss activity codes |
| 408 | A 530(a) | Type | EATON CEN | ITER | | | | | (See i | nstructions for I | Block E on page 9.) |
| 529 | (a) | | City or town, state, a | ind ZIP code | | | | | | | |
| | lue of all assets | | GAMBIER, | ОН 43022 | | | | | 721 | 110 | 525990 |
| at end o | i yeai | F Gro | up exemption num | ber (See instru | ctions fo | or Block F on page 9 |) 🕨 | | | | |
| _565 , | 708,744. | G Che | ck organization typ | e ▶ X 50 | 1(c) co | rporation | 501(0 | c) trust | 401(a) | trust [| Other trust |
| H Descri | ibe the organiz | ation's p | rimary unrelated bu | siness activity. | <u> </u> | SEE S | STATE | MENT 1 | | | |
| _ | | | • | • | _ | roup or a parent-sub | sidiary o | controlled group |)? | ▶∟ | Yes X No |
| | | | identifying number | - | orporation | | | | | | |
| | | | SHIRLEY O'E | | | | elephon | e number > | | - | |
| Part I | | | or Business I | | 1 | (A) Income | | (B) Exp | enses | | (C) Net |
| | oss receipts or s | sales | 402,852 | | | | . = 0 | | | | |
| | | | | | | 402,8 | | | | | |
| | • | • | ule A, line 7) | | | 326,6 | | | | | 76.160 |
| | | | 2 from line 1c | | | 76,1 | .69. | | | | 76,169. |
| | | | ttach Schedule D) | | | | | | | | |
| | | | Part II, line 17) (attach | | | | | | | | |
| | | | rusts os and S corporations | | | -1,273,5 | . 1 0 | STMT 2 | | _1 | ,273,548. |
| | | | | | ′ — | 1,2/3,3 | 740. | DIMI 2 | | | .,273,340. |
| | | | come (Schedule E) | | | | | | | | |
| | | | ies, and rents fi | | | | | | | | |
| | | • | | | | | | | | | |
| | | | section 501(c)(7 | | | | | | | | |
| | | | | | | | | | | | |
| | | | ncome (Schedule I) | | | | | | | | |
| 11 Adv | vertising incom | ne (Sched | lule J) | | 11 | | | | | | |
| | | | of the instructions; att | | | | | | | | |
| | | | ough 12 | | | -1,197,3 | | | | | ,197,379. |
| Part II | | | | | - | of the instruction | | | | | |
| | | | | | | ectly connected | | | | ss income | e.) |
| | | | | | | | | | | | |
| | | | | | | | | | | | 3,333. |
| | | | | | | | | | | | 9,113. |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| 19 Tax20 Cha | aritable contrib | o Jutione / G | See nage 13 of the | instructions for | limitati | on rules.) | • • • | | 20 | | |
| | | • | | | | 21 | | 97,8 | | | |
| | | | | | | 22a | | 77,2 | | , | 20,601. |
| | | | | | | | | | | | 20,001. |
| | | | | | | | | | | | |
| 25 Em | ployee benefit | programs | · · · · · · · · · · · · · · · · · · · | | | | | | 25 | | 8,824. |
| 26 Exc | ess exempt ex | penses (| Schedule I) | | | | | | 26 | | |
| | | | | | | | | | | | |
| 28 Oth | ner deductions | (attach s | chedule) | | | SEE S | STATE | MENT 3 | 28 | | 8,498. |
| 29 Tot | al deductions. | Add line | s 14 through 28 | | | | | | 29 | | 50,369. |
| 30 Uni | related busine | ss taxabl | e income before ne | et operating los | s dedu | ction. Subtract line 2 | 9 from | line 13 | 30 | -1 | ,247,748. |
| | | | | | | | | | | | |
| 32 Uni | related busine | ss taxabl | e income before sp | ecific deduction | n. Subt | ract line 31 from line | 30 . | | 32 | -1 | ,247,748. |
| | | | | | | or exceptions.) | | | 33 | | 1,000. |
| | | | | | | If line 33 is greater | | | | | |
| 32, | enter the sma | aller of ze | ro or line 32 | | | | | | 34 | | <u>,247,748.</u> |

Form 990-T (2008) 31-4379507 Page **2**

| Par | t III T | ax Computation | <u> </u> | 137330 | , | <u> </u> |
|-------------|-------------|---|---------------|------------------------|------------------|--------------|
| 35 | | | 15. | | | |
| | • | group members (sections 1561 and 1563) check here See instructions and: | | | | |
| а | | share of the \$50,000, \$25,000, and \$9,925,000 taxable income brackets (in that order): | | | | |
| | (1) | (2) (3) | | | | |
| b | | nization's share of: (1) Additional 5% tax (not more than \$11,750) | | | | |
| | | nal 3% tax (not more than \$100,000) | | | | |
| С | | on the amount on line 34 | • | 35c | | |
| 36 | | exable at Trust Rates. See instructions for tax computation on page 16. Income tax | | | | |
| | the amour | t on line 34 from: Tax rate schedule or Schedule D (Form 1041) | ▶ | 36 | | |
| 37 | | See page 16 of the instructions | - 1 | 37 | | |
| 38 | | minimum tax | | 38 | | |
| 39 | Total. Add | lines 37 and 38 to line 35c or 36, whichever applies | | 39 | | |
| Par | | ax and Payments | | | | |
| 40 a | Foreign ta | c credit (corporations attach Form 1118; trusts attach Form 1116) 40a | | | | |
| b | Other cred | its (see page 17 of the instructions) | | | | |
| С | General b | siness credit. Attached Form 3800 40c | | | | |
| d | | prior year minimum tax (attach Form 8801 or 8827) 40d | | | | |
| е | Total cred | ts. Add lines 40a through 40d | L | 40e | | |
| 41 | | ne 40e from l <u>ine 3</u> 9 <u></u> <u></u> | [| 41 | | |
| 42 | Other taxes | Check if from: Form 4255 Form 8611 Form 8697 Form 8866 Other (attach schedu | ule) | 42 | | |
| 43 | Total tax. | Add lines 41 and 42 | L | 43 | | |
| 44 a | Payments | A 2007 overpayment credited to 2008 | 76. | | | |
| b | | nated tax payments | 00. | | | |
| С | | ted with Form 8868 | | | | |
| d | Foreign or | ganizations: Tax paid or withheld at source (see instructions) 44d | | | | |
| е | Backup w | hholding (see instructions) | | | | |
| f | Other cree | its and payments: Form 2439 | | | | |
| | For | n 4136 Other Total ▶ 44f | | | | |
| 45 | Total pay | nents. Add lines 44a through 44f | | 45 | 103,5 | 576 |
| 46 | Estimated | tax penalty (see page 4 of the instructions). Check if Form 2220 is attached | | 46 | | |
| 47 | Tax due. I | line 45 is less than the total of lines 43 and 46, enter amount owed | .▶ | 47 | 1 | NON |
| 48 | | ent. If line 45 is larger than the total of lines 43 and 46, enter amount overpaid | | 48 | 103,5 | 576 |
| 49 | _ | amount of line 48 you want: Credited to 2009 estimated tax | | 49 | | |
| Par | V S | tatements Regarding Certain Activities and Other Information (see instruc | ctions | on page 1 | 8) | |
| 1 | • | e during the 2008 calendar year, did the organization have an interest in or a signature or other aut | • | | | No |
| | • | ank, securities, or other) in a foreign country? If YES, the organization may have to file Form TD F 90-2 | 2.1, R | eport of Fore | eign | |
| | | inancial Accounts. If YES, enter the name of the foreign country here ▶ ENGLAND, _ ITALY | | | X | |
| 2 | | $tax\ year,\ did\ the\ organization\ receive\ a\ distribution\ from,\ or\ was\ it\ the\ grantor\ of,\ or\ transferor\ to,\ a$ | foreig | n trust? | | X |
| | , | page 5 of the instructions for other forms the organization may have to file. | | | | |
| 3 | | amount of tax-exempt interest received or accrued during the tax year \$ | | | | |
| | | - Cost of Goods Sold. Enter method of inventory valuation ▶ | | _ | | |
| 1 | | at beginning of year 1 6 Inventory at end of year | | 6 | | |
| 2 | Purchases | 7 Cost of goods sold. Subtract I | | | | |
| 3 | | or | in | _ | | |
| 4 a | | section 263A costs Part I, line 2 | L | 7 | 326,6 | |
| | | nedule) | | - | | No |
| | | s (attach schedule) . 4b ** 326,683. property produced or acquired | | , , | . , | |
| | | lines 1 through 4b 5 326,683 to the organization? Thatties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the | | | | X ie true |
| Gi~- | correct a | d complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge. | 2031 UI | y Kilowieuge | and Donot, It I | .o uue |
| Sigr Her | | | | | cuss this return | with |
| пег | | e of officer Date Title | _ | preparer shoructions)? | wn below (see | N. |
| | Joigilatu | ▶ Date | | Preparer's SS | | No |
| Paid | | Preparer's Check if | $\neg \vdash$ | · | | |
| Prep | arer's | Firm's name (or | 21/ | | 26559 | |
| Use | Only | yours if self-employed), MALONEY + NOVOINY LLC | | 0677006 | | |
| | * * | address, and ZIP code 1111 SUPERIOR AVENUE, SUITE 700 Phone no. 21 | 0-31 | | orm 990-T (| 2008 |

Form 990-T (2008) 31-4379507 Page **3**

| 1 Description of property | | | | | | | | |
|--|--|--|---|-------------|----------------------------------|--|--------------------|---|
| (1) | | | | | | | | |
| (2) | | | | | | | | |
| (2) | | | | | | | | |
| | | | | | | | | |
| (4) | | | | | | | | |
| | 2 Rent received of | | | | | | | |
| (a) From personal property (if the for personal property is more than 50% | nan 10% but not | percenta | om real and personal propage of rent for personal propage if the rent is based on pro | perty | exceeds | | | nected with the income in (attach schedule) |
| (1) | | | | | | | | |
| (2) | | | | | | | | |
| (3) | | | | | | | | |
| (4) | | | | | | | | |
| Total | To | otal | | | | | | |
| (c) Total income. Add totals of c | columns 2(a) and 2(b). F | nter | | | | (b) Total deduce Enter here and of | | |
| here and on page 1, Part I, line 6 | . , . , , | | | | | Part I, line 6, colu | | |
| Schedule E - Unrelated D | | | e instructions on page | ae 19 | | | (= / • | |
| | | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | 2 Gross income from | or | | ctions directly con debt-finance | | or allocable to |
| 1 Description of de | bt-financed property | | allocable to debt-financ property | ed | | line depreciation schedule) | |) Other deductions (attach schedule) |
| (1) | | | | | | | | |
| (2) | | | | | | | | |
| (3) | | | | | | | | |
| (4) | | | | | | | | |
| 4 Amount of average | 5 Average adjusted ba | asis of | | | | | | |
| acquisition debt on or allocable to debt-financed property (attach schedule) | or allocable to debt-financed propo (attach schedule | erty | 6 Column 4 divided by column 5 | | | ome reportable ! x column 6) | | llocable deductions n 6 x total of columns 3(a) and 3(b)) |
| (1) | | | | % | | | | |
| (2) | | | | % | | | | |
| (3) | | | | % | | | | |
| (4) | | | | % | | | | |
| Totals Total dividends-received deduc | tions included in colum | . n 8 | | . | | and on page 1, , column (A). | Enter I Part I, | nere and on page 1, line 7, column (B). |
| Schedule F - Interest, An | | | ents From Control | led | Organizati | ons (see instri | ictions o | n nage 20) |
| <u> </u> | | | empt Controlled Org | | | One (see mour | | n page 20) |
| Name of controlled organization | 2 Employer identification number | r : | 3 Net unrelated income (loss) (see instructions) | 4 To | otal of specified yments made | 5 Part of colum included in the organization's gre | controlling | 6 Deductions directly connected with income in column 5 |
| (1) | | | | | | | | |
| (2) | | | | | | | | |
| (3) | | | | | | | | |
| (4) | | | | | | | | |
| Nonexempt Controlled Orga | nizations | | | | | • | | • |
| 7 Taxable Income | 8 Net unrelated inc (loss) (see instruction | | 9 Total of specified payments made | d | include | t of column 9 that is ed in the controlling ation's gross incom- | cor | 1 Deductions directly nected with income in column 10 |
| (1) | | | | | . 5 | <u> </u> | | |
| (2) | | | | | | | | |
| (3) | | | | | | | | |
| (4) | | | | | | | | |
| A.7 | I | | ı | | Enter here | nns 5 and 10. and on page 1, 8, column (A). | Enter | columns 6 and 11. here and on page 1, , line 8, column (B). |

Form **990-T** (2008)

| Form 990-1 (2008) | | -4: F04/-\ | / / / | (0) or (47) Orma | | <u>-43/950/</u> | | | ~~ 04\ | Page 4 |
|---|--|--|------------------|--|--------|---|------|-------------------------------------|------------------------------|---|
| Schedule G - Investment Ir | come of a Sec | ction 501(c) | (7), | (9), or (17) Orgal 3 Deductions | nızat | | | | | deductions |
| 1 Description of income | 2 Amount o | f income | | directly connected (attach schedule) | | 4 Set (attach | | | and set- | asides (col. 3 s col. 4) |
| (1) | | | | (attaon concade) | | | | | p.u | o oo, |
| (2) | | | | | | | | | | |
| (3) | | | | | | | | | | |
| (4) | | | | | | | | | | |
| · / | Enter here and | | | | | | | | | and on page 1 |
| | Part I, line 9, co | olumn (A). | | | | | | | Part I, line | 9, column (B). |
| Totals ▶ | | | | | | | | | | |
| Schedule I - Exploited Exe | empt Activity In | come. Other | r Tha | an Advertising In | com | e (see instru | ctio | ns on page | 21) | |
| | | | | 4 Net income | | - (| | | Τ΄ | |
| 1 Description of exploited activity | 2 Gross unrelated business income from trade or business | 3 Expenses directly connec with production unrelated busin- income | n of | (loss) from unrelated trade or business (column 2 minus column 3). If a gain, compute cols. 5 through 7. | fron | Gross income n activity that not unrelated siness income | | 6 Expenses attributable to column 5 | (colu | cess exempt expenses umn 6 minus mn 5, but not nore than olumn 4). |
| (1) | | | | | | | | | | |
| (2) | | | | | | | | | | |
| (3) | | | | | | | | | | |
| (4) | | | | | | | | | | |
| | Enter here and on page 1, Part I, line 10, col. (A). | Enter here and page 1, Part line 10, col. (E | l, | | | | | | or | er here and n page 1, t II, line 26. |
| Totals | | | 0 | 1) | | | | | | |
| Schedule J - Advertising Ir | | | | · | | | | | | |
| Part I Income From Per | iodicals Report | ted on a Con | ISOII | dated Basis | | | | | | |
| 1 Name of periodical | 2 Gross advertising income | 3 Direct advertising co | sts | 4 Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7. | 5 | Circulation income | | 6 Readership costs | costs minu but n | ess readership s (column 6 s column 5, ot more than olumn 4). |
| (1) | | | | | | | | | | |
| (2) | | | | | | | | | | |
| (3) | | | | | | | | | | |
| (4) | | | | | | | | | | |
| () | | | | | | | | | | |
| Totals (carry to Part II, line (5)) | | | | | | | | | | |
| Part II Income From Per through 7 on a line | iodicals Repor | | ara | te Basis (For eac | ch pe | eriodical list | ed i | n Part II, fi | II in colu | ımns 2 |
| 1 Name of periodical | 2 Gross advertising income | 3 Direct advertising co | sts | 4 Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7. | 5 | Circulation income | | 6 Readership costs | costs minu but n | ess readership s (column 6 s column 5, ot more than olumn 4). |
| (1) | | | | | | | | | | |
| (1) | | | | | | | | | | |
| (2) | | | | | | | | | | |
| (3) | | | | | | | | | | |
| (4) | | | | | | | | | | |
| (5) Totals from Part I | Fater have and an | Enter have and | | | | | | | F=4 | |
| Totals, Part II (lines 1-5) ▶ | Enter here and on page 1, Part I, line 11, col. (A). | Enter here and page 1, Part line 11, col. (E | 1 | | | | | | 0 | er here and n page 1, t II, line 27. |
| Schedule K - Compensation | n of Officers. D | Directors. an | d Tr | ustees (see instru | uction | s on page 22 | 2) | | | |
| 1 Name | | | | 2 Title | | 3 Percent of time devoted to business | | | ensation atti elated busi | |
| | | | | | | | % | | | |
| | | | | | | | % | | | |
| | | | | | | | % | | | |
| | | | | | | | % | | | |
| Total. Enter here and on page 1, F | Part II, line 14 | | | | | | . 🕨 | | | |

Form **990-T** (2008)

ORGANIZATION'S PRIMARY UNRELATED BUSINESS ACTIVITY.

HOTEL, SUMMER SPORTS CAMPS, CONFERENCES, AND INVESTMENTS IN PARTNERSHIPS THAT GENERATE UNRELATED BUSINESS INCOME

FORM 990T - LINE 5 -INCOME (LOSS) FROM PARTNERSHIPS

| ABS CAPITAL PARTNERS V, LP ADAMAS OPPORTUNITIES, LP ADAMAS PARTNERS, LP CEREP III, LP CHESAPEAKE INV III, LP COLLER INTL PARTNERS V-A, LP COMMONFUND CAP NAT RES PARTNERS VI, LP ENDOWMENT VENTURE PARTNERS V, LP LUBERT-ADLER REAL EST FUND VI, LP MADISON DEARBORN CAP PARTNERS IV, LP MADISON DEARBORN CAP PARTNERS V-B, LP MCCOWN DE LEEUW & CO. METROPOLITAN REAL EST PARTNERS V, LP OAKTREE JAPAN OPP. FUND, LP PAUL CAPITAL PARTNERS IX, LP PINNACLE NATURAL RESOURCES, LP ROCKBRIDGE REAL EST FUND III, LLC ROCKBRIDGE REAL EST FUND III, LLC ROCKBRIDGE HOSPITALITY FUND IV, LP TCW/CRESCENT MEZZANINE PARTNERS VB, LP TRIDENT CAP FUND VI, LP VERDIS REAL ASSETS FUND, LP WALDEN VC II, LP WESTON PRESIDIO V, LP YORKTOWN ENERGY PARTNERS VII, LP | -12,9198,3863,15991,31713,341. 10,9011,216. 21710,680. 239,030. 241. 5,97851139,0336793,0962,3331,051,024243,57621647617,443441. 15,50045,569. |
|---|--|
| INCOME (LOSS) FROM PARTNERSHIPS | -1,273,548. |

FORM 990T - PART II - LINE 28 - TOTAL OTHER DEDUCTIONS

UTILITIES MISCELLANEOUS 7,803. 695.

PART II - LINE 28 - OTHER DEDUCTIONS

8,498.

FORM 990T - SCHEDULE A - LINE 4B - OTHER COSTS

| FOOD SERVICES | 173,567. |
|---------------------------|------------|
| MAINTENANCE/CUSTODIAL | 23,562. |
| LINEN SERVICE | 8,458. |
| KENYON INN - DEPRECIATION | 77,227. |
| KENYON INN EXPENSES | 40,084. |
| MISCELLANEOUS | 3,785. |
| TOTAL OTHER COSTS | 326,683. |
| | ========== |

(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**

| ame of transferor | 11 (15) | | | | | |
|--|---|--|--|--|--|--|
| VENUENT COLLEGE | Identifying number (see instructions) | | | | | |
| KENYON COLLEGE | 31-4379507 | | | | | |
| 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 (unc | ` ' | | | | | |
| 5 or fewer domestic corporations? | · · · · · · · · · · · · · · · · · · · | | | | | |
| b Did the transferor remain in existence after the transfer? | Yes No | | | | | |
| If not, list the controlling shareholder(s) and their identifying number(s): | | | | | | |
| Controlling shareholder | Identifying number | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| c If the transferor was a member of an affiliated group filing a consolidated return, was corporation? | Yes No | | | | | |
| If not, list the name and employer identification number (EIN) of the parent corporation | on: | | | | | |
| 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 transferor (bu complete questions 2a through 2d. | ut 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 | | | | | |
| DAMAS PARTNERS, LP | 04-3514358 | | | | | |
| b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? | | | | | | |
| c Is the partner disposing of its entire interest in the partnership? | —————————————————————————————————————— | | | | | |
| d Is the partner disposing of an interest in a limited partnership that is regularly traded | | | | | | |
| | | | | | | |
| | I I I I I I I I I I I I I I I I I I I | | | | | |
| securities market? | | | | | | |
| art II Transferee Foreign Corporation Information (see instructions) | 4 Identifying number if any | | | | | |
| Art II Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) | 4 Identifying number, if any | | | | | |
| Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) MBS OPP. FUND (OFFSHORE) LP | 4 Identifying number, if any FOREIGNUS | | | | | |
| Name of transferee (foreign corporation Information (see instructions) Name of transferee (foreign corporation) MBS OPP. FUND (OFFSHORE) LP Address (including country) WALKERS HOUSE 87 MARY STREET | | | | | | |
| Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) MBS OPP. FUND (OFFSHORE) LP Address (including country) WALKERS HOUSE 87 MARY STREET EORGE TOWN GRAND CAYMAN CJ KY1-9001 | | | | | | |
| Name of transferee (foreign corporation Information (see instructions) Name of transferee (foreign corporation) MBS OPP. FUND (OFFSHORE) LP Address (including country) WALKERS HOUSE 87 MARY STREET EORGE TOWN GRAND CAYMAN CJ KY1-9001 Country code of country of incorporation or organization (see instructions) | | | | | | |
| Name of transferee (foreign corporation Information (see instructions) Name of transferee (foreign corporation) MBS OPP. FUND (OFFSHORE) LP Address (including country) WALKERS HOUSE 87 MARY STREET EORGE TOWN GRAND CAYMAN CJ KY1-9001 Country code of country of incorporation or organization (see instructions) J | | | | | | |
| Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) MBS OPP. FUND (OFFSHORE) LP Address (including country) WALKERS HOUSE 87 MARY STREET EORGE TOWN GRAND CAYMAN CJ KY1-9001 Country code of country of incorporation or organization (see instructions) J Foreign law characterization (see instructions) | | | | | | |
| Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) MBS OPP. FUND (OFFSHORE) LP Address (including country) WALKERS HOUSE 87 MARY STREET EORGE TOWN GRAND CAYMAN CJ KY1-9001 Country code of country of incorporation or organization (see instructions) J | FOREIGNUS | | | | | |

| 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 |
|----------------------------------|----------------------------|-----------------------------|---|-------------------------------|---------------------------------|
| ash | 05/20/2008 | | 2,148,542. | | |
| - | | | | | |
| ock and | | | | | |
| ecurities | | | | | |
| | | | | | |
| stallment bligations, | | | | | |
| count | | | | | |
| ceivables or | | | | | |
| milar property | | | | | |
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| ssets subject to preciation | | | | | |
| capture (see | | | | | |
| mp. Regs. sec. | | | | | |
| 367(a)-4T(b)) | | | | | |
| angible property sed in trade or | | | | | |
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| emp. Regs. sec. 367(a)-4T(c)) | | | | | |
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| escribed in emp. Regs. sec. | | | | | |
| 367(a)-4T(d)) | | | | | |
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| s working interests | | | | | |
| described in p. Regs. sec. | | | | | |
| 367(a)-4T(e)) | | | | | |
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| her property | | | | | |
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| inniamental Ir | formation Required | In Re Renorted (see | inctructions): | | |

| Form 926 | (Rev. | 12-2008 |
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Part IV Additional Information Regarding Transfer of Property (see instructions)

| 9 E | Enter the transferor's interest in the foreign transferee corporation before and after the transfer: | | |
|--------|--|-----------------|------------------------------|
| (8 | a) Before 1.79 % (b) After 1.79 % | | |
| 10 | Type of nonrecognition transaction (see instructions) \blacktriangleright 351 | | |
| b c | Indicate whether any transfer reported in Part III is subject to any of the following: Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 | Yes Yes Yes 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 |
| b 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 | Yes Yes Yes Yes | 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)? | Yes | X No |
| 15a | 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? | X Yes | ☐ No |
| 17a | 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: | | |
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Form **926**

(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.

OMB No. 1545-0026

Attachment Sequence No. 128

| Part I U.S. Transferor Information (see instructions) | | | | | |
|--|---|--|--|--|--|
| lame of transferor | Identifying number (see instructions) | | | | |
| KENYON COLLEGE | 31-4379507 | | | | |
| If the transferor was a corporation, complete questions 1a throu a If the transfer was a section 361(a) or (b) transfer, was the tran 5 or fewer domestic corporations? | sferor controlled (under section 368(c)) by | | | | |
| b Did the transferor remain in existence after the transfer? | | | | | |
| If not, list the controlling shareholder(s) and their identifying num | nber(s): | | | | |
| Controlling shareholder | Identifying number | | | | |
| | | | | | |
| | | | | | |
| c If the transferor was a member of an affiliated group filing a cor | nsolidated return, was it the parent | | | | |
| corporation? If not, list the name and employer identification number (EIN) of | Yes No | | | | |
| Name of parent corporation | EIN of parent corporation | | | | |
| d Have basis adjustments under 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: | | | | | |
| Name of partnership | EIN of partnership | | | | |
| ADAMAS PARTNERS, LP | 04-3514358 | | | | |
| b Did the partner pick up its pro rata share of gain on the transfer c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership th securities market? | of partnership assets? | | | | |
| Part II Transferee Foreign Corporation Information (see in | structions) | | | | |
| Name of transferee (foreign corporation) ADARO ENERGY TBK Address (including country) MENARA KARYA BLOK | 4 Identifying number, if any FOREIGNUS X-5, KAV.1-2 | | | | |
| JAKARTA ID 6 Country code of country of incorporation or organization (see in | structions) | | | | |
| 7 Foreign law characterization (see instructions) | | | | | |
| CORPORATION 8 Is the transferee foreign corporation a controlled foreign corpora | ation?Yes No | | | | |
| for Paperwork Reduction Act Notice, see separate instructions. | ation? Yes No Form 926 (Rev. 12-2008 | | | | |

| 07/15/2008 | property | 1,317,678. | | transfer |
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| Form 926 | (Rev. | 12-2008 |
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Part IV Additional Information Regarding Transfer of Property (see instructions)

| 9 Ent | ter the transferor's interest in the foreign transferee corporation before and after the transfer: | | |
|------------------------------|--|---------------------|------------------------------|
| (a) | Before 1.77 % (b) After 1.77 % | | |
| 10 | Type of nonrecognition transaction (see instructions) \blacktriangleright 351 | | |
| a (b (c d | Indicate whether any transfer reported in Part III is subject to any of the following: Gain recognition under section 904(f)(3) | Yes Yes Yes Yes Yes | X No X No X No X No |
| a ⁻ b l c l | 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 | Yes Yes Yes Yes | X No X No X No X No |
| 14 I | 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)? | Yes | X No |
| | 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 |
| | Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction? | Yes | X No |
| | 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.

OMB No. 1545-0026

Attachment Sequence No. 128

| Part I U.S. Transferor Information (see instructions) | |
|---|---|
| Name of transferor | Identifying number (see instructions) |
| KENYON COLLEGE | 31-4379507 |
| If the transferor was a corporation, complete questions 1a thr | |
| a If the transfer was a section 361(a) or (b) transfer, was the tr | |
| 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 n | umber(s): |
| Controlling shareholder | Identifying number |
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| | |
| c If the transferor was a member of an affiliated group filing a corporation? | Yes No |
| If not, list the name and employer identification number (EIN) | of the parent corporation: |
| Name of parent corporation | EIN of parent corporation |
| | |
| d Have basis adjustments under section 367(a)(5) been made? | Yes No |
| If the transferor was a partner in a partnership that was th | e actual transferor (but is not treated as such under section 367 |
| complete questions 2a through 2d. | ` |
| a List the name and EIN of the transferor's partnership: | |
| Name of partnership | EIN of partnership |
| | 0.4.051.4050 |
| DAMAS PARTNERS, LP | 04-3514358 |
| b Did the partner pick up its pro rata share of gain on the transfer | |
| c Is the partner disposing of its entire interest in the partnershipd Is the partner disposing of an interest in a limited partnership | |
| securities market? | <u> </u> |
| Part II Transferee Foreign Corporation Information (see | |
| Name of transferee (foreign corporation) | 4 Identifying number, if any |
| SEOTECH OIL SERVICES HOLDING LTD | FOREIGNUS |
| 5 Address (including country) THASOU 3 DADLAW | |
| IICOSIA CY | |
| 6 Country code of country of incorporation or organization (see | instructions) |
| CY | |
| 7 Foreign law characterization (see instructions) | |
| CORPORATION | |
| Is the transferee foreign corporation a controlled foreign corporation | |
| or Paperwork Reduction Act Notice, see separate instructions. | Form 926 (Rev. 12-2008 |

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| esets subject to preciation capture (see mp. Regs. sec. 367(a)-4T(b)) ed in trade or siness not listed der another tegory easily tangible operty easily to be ased (as scribed in mp. Regs. sec. 367(a)-4T(c)) eserty to be lid (as | | | | |
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| ngible property ed in trade or siness not listed der another tegory angible poperty operty to be used (as scribed in mp. Regs. sec. 367(a)-4T(c)) operty to be lid (as | | | | |
| angible property ed in trade or siness not listed ider another tegory tangible operty operty to be ased (as scribed in mp. Regs. sec. 367(a)-4T(c)) operty to be Id (as | | | | |
| ed in trade or siness not listed der another tegory angible operty operty to be used (as scribed in mp. Regs. sec. 367(a)-4T(c)) operty to be used (as | | | | |
| siness not listed der another tegory tangible operty operty to be ased (as secribed in mp. Regs. sec. 367(a)-4T(c)) operty to be lid (as | | | | |
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| s working interests | | | | |
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| 67(a)-4T(e)) | | | | |
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| upplemental Information | | | instructions): | |
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| Form 926 | (Rev. 12-200 | 8 |
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Part IV Additional Information Regarding Transfer of Property (see instructions)

| 9 E | nter the transferor's interest in the foreign transferee corporation before and after the transfer: | | |
|-------------------|--|-----------------|---------|
| (a | a) Before <u>1.77</u> % (b) After <u>1.77</u> % | | |
| 10 | Type of nonrecognition transaction (see instructions) \blacktriangleright 351 | | |
| 11 a b c | Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) | Yes Yes Yes Yes | X No |
| 12 | Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? | Yes | X No |
| b 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 | Yes Yes 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 |
| | 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 |
| ~ | transferred > \$ | | |
| 16 | Was cash the only property transferred? | X Yes | ☐ No |
| 17a | 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: | | |
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(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**

| me of transferor | 1.1 4.5 1 1 (|
|--|--|
| | Identifying number (see instructions) |
| KENYON COLLEGE | 31-4379507 |
| 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 transfero | ```` |
| 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 |
| | |
| | |
| | |
| c If the transferor was a member of an affiliated group filing a consolid- | ated return, was it the parent |
| | |
| corporation? If not, list the name and employer identification number (EIN) of the part o | arent corporation: |
| in not, not the name and employer rechanged in the name of (Env) of the p | aron corporation. |
| 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 complete questions 2a through 2d. | I transferor (but is not treated as such under section 36 |
| | |
| | |
| | EIN of partnership |
| a List the name and EIN of the transferor's partnership: Name of partnership | |
| Name of partnership DAMAS PARTNERS LP | 04-3514358 |
| Name of partnership DAMAS PARTNERS LP b Did the partner pick up its pro rata share of gain on the transfer of par | 04-3514358 tnership assets? |
| Name of partnership DAMAS PARTNERS LP b Did the partner pick up its pro rata share of gain on the transfer of parc Is the partner disposing of its entire interest in the partnership? | 04-3514358 tnership assets? |
| Name of partnership DAMAS PARTNERS LP b Did the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is it | thership assets? Yes X No Yes X No egularly traded on an established |
| Name of partnership DAMAS PARTNERS LP b Did the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is a securities market? | 04−3514358 tnership assets? |
| Name of partnership DAMAS PARTNERS LP b Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is a securities market? Transferee Foreign Corporation Information (see instruction) | thership assets? Yes X No Yes X No egularly traded on an established Yes X No tions) |
| Name of partnership DAMAS PARTNERS LP b Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is a securities market? Transferee Foreign Corporation Information (see instruct Name of transferee (foreign corporation) | thership assets? Yes X No Yes X No egularly traded on an established Yes X No tions) 4 Identifying number, if any |
| Name of partnership DAMAS PARTNERS LP b Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is a securities market? Transferee Foreign Corporation Information (see instruct Name of transferee (foreign corporation) LAYA HOTEL & RESORTS S.L. | thership assets? Yes X No Yes X No egularly traded on an established Yes X No tions) 4 Identifying number, if any FOREIGNUS |
| Name of partnership DAMAS PARTNERS LP b Did the partner pick up its pro rata share of gain on the transfer of part c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is a securities market? Transferee Foreign Corporation Information (see instruct Name of transferee (foreign corporation) LAYA HOTEL & RESORTS S.L. Address (including country) 27 07006 PALMA DE MAL | thership assets? Yes X No Yes X No egularly traded on an established Yes X No tions) 4 Identifying number, if any FOREIGNUS |
| Name of partnership DAMAS PARTNERS LP b Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is a securities market? Transferee Foreign Corporation Information (see instruct Name of transferee (foreign corporation) LAYA HOTEL & RESORTS S.L. | thership assets? Yes X No Yes X No egularly traded on an established Yes X No tions) 4 Identifying number, if any FOREIGNUS |
| Name of partnership DAMAS PARTNERS LP b Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is a securities market? Transferee Foreign Corporation Information (see instruct Name of transferee (foreign corporation) LAYA HOTEL & RESORTS S.L. Address (including country) 27 07006 PALMA DE MALALEARES SP Country code of country of incorporation or organization (see instruct | thership assets? Yes X No Yes X No egularly traded on an established Yes X No tions) 4 Identifying number, if any FOREIGNUS |
| Name of partnership DAMAS PARTNERS LP b Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is a securities market? art II Transferee Foreign Corporation Information (see instruct Name of transferee (foreign corporation) LAYA HOTEL & RESORTS S.L. Address (including country) 27 07006 PALMA DE MALALEARES SP Country code of country of incorporation or organization (see instruct page 2) | thership assets? Yes X No Yes X No egularly traded on an established Yes X No tions) 4 Identifying number, if any FOREIGNUS |
| Name of partnership DAMAS PARTNERS LP b Did the partner pick up its pro rata share of gain on the transfer of part is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is a securities market? Transferee Foreign Corporation Information (see instruct Name of transferee (foreign corporation) LAYA HOTEL & RESORTS S.L. Address (including country) 27 07006 PALMA DE MALALEARES SP | thership assets? Yes X No Yes X No egularly traded on an established Yes X No tions) 4 Identifying number, if any FOREIGNUS |

| 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 |
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Part IV Additional Information Regarding Transfer of Property (see instructions)

| 9 E | Enter the transferor's interest in the foreign transferee corporation before and after the transfer: | | |
|--------|--|-----------------|------------------------------|
| (a | a) Before 1.78 % (b) After 1.78 % | | |
| 10 | Type of nonrecognition transaction (see instructions) \blacktriangleright 351 | | |
| b c | Indicate whether any transfer reported in Part III is subject to any of the following: Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 | Yes Yes Yes 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 |
| b 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 | Yes Yes Yes Yes | 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)? | Yes | X No |
| 15a | 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 | 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? | X Yes | ☐ No |
| 17a | Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction? | Yes | X No |
| b | o If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction: | | |
| | | | |
| | | | |

Form **926**

(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.

OMB No. 1545-0026

Attachment Sequence No. **128**

| Part I U.S. Transferor Information (see instructions) | Identification and a contraction of |
|---|--|
| lame of transferor | Identifying number (see instructions) |
| KENYON COLLEGE | 31-4379507 |
| If the transferor was a corporation, complete questions 1a through a If the transfer was a section 361(a) or (b) transfer, was the transferor fewer domestic corporations? b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identifying numbers. | feror controlled (under section 368(c)) by Yes No Yes No |
| Controlling shareholder | Identifying number |
| | |
| | |
| c If the transferor was a member of an affiliated group filing a conscorporation? If not, list the name and employer identification number (EIN) of | Yes No |
| Name of parent corporation | EIN of parent corporation |
| d Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the a complete questions 2a through 2d. | |
| a List the name and EIN of the transferor's partnership: | |
| Name of partnership | EIN of partnership |
| DAMAS PARTNERS LP | 04-3514358 |
| b Did the partner pick up its pro rata share of gain on the transfer of ls the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that securities market? | f partnership assets? Yes X No Yes X No t is regularly traded on an established Yes X No |
| Part II Transferee Foreign Corporation Information (see ins | tructions) |
| Name of transferee (foreign corporation) | 4 Identifying number, if any |
| PASSERINE AT ABACO HLDGS LTD Maddress (including country) P.O. BOX AB 20766 | FOREIGNUS MARCH HARROUR |
| BACO BF | MARCH HARBOUR |
| Country code of country of incorporation or organization (see ins | tructions) |
| F | , |
| Foreign law characterization (see instructions) | |
| ORPORATION | |
| ORPORATION Is the transferee foreign corporation a controlled foreign corporat | ion?Yes X No |
| or Panerwork Reduction Act Notice see senarate instructions | IOII: Yes A NO |

| Type of property | (a) Date of transfer | (b) Description of property | (c) Fair market value on date of transfer | (d) Cost or other basis | (e) Gain recognized on transfer |
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| apture (see np. Regs. sec. | | | | | |
| 867(a)-4T(b)) | | | | | |
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| d (as scribed in | | | | | |
| mp. Regs. sec. | | | | | |
| 367(a)-4T(d)) | | | | | |
| nsfers of oil and working interests | | | | | |
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| inniemental II | nonnanon Reuulfed | TO DE REDUITEU (See | : IOSOTOCHOUST | | |

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 1.78 % (b) After 1.78 % Type of nonrecognition transaction (see instructions) \triangleright 351 Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3) Yes Yes No Yes c Recapture under section 1503(d) d Exchange gain under section 987 Χ Yes X No Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? 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: a Tainted property Yes No Χ No Yes Yes No 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)? 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations

section 1.367(a)-1T(d)(5)(iii)?

17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?

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

Was cash the only property transferred? Yes

b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value

Form **926** (Rev. 12-2008)

transferred ► \$

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.

OMB No. 1545-0026

Attachment Sequence No. 128

| art I U.S. Transferor Information (see instructions) | |
|---|--|
| ame of transferor | Identifying number (see instructions) |
| KENYON COLLEGE | 31-4379507 |
| If the transferor was a corporation, complete questions 1a through | |
| a If the transfer was a section 361(a) or (b) transfer, was the trans | |
| 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 num | iber(s). |
| Controlling shareholder | Identifying number |
| | |
| | |
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| | |
| If the transferor was a member of an affiliated group filing a concorporation? If not, list the name and employer identification number (EIN) of | Yes No |
| Name of parent corporation | EIN of parent corporation |
| J. Have been adjustments under cestion 267(a)/E) been made? | |
| 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. | actual transferor (but is not treated as such under section 36 |
| a List the name and EIN of the transferor's partnership: | |
| Name of partnership | EIN of partnership |
| AMAS PARTNERS LP | 04-3514358 |
| Did the partner pick up its pro rata share of gain on the transfer of | |
| Is the partner disposing of its entire interest in the partnership? | |
| I Is the partner disposing of an interest in a limited partnership the | at is regularly traded on an established |
| securities market? | |
| rt II Transferee Foreign Corporation Information (see ins | |
| Name of transferee (foreign corporation) | 4 Identifying number, if any |
| P-1 CAYMAN II LTD Address (including country) P O BOY 309 | FOREIGNUS |
| 1.0. BOX 303 | |
| RAND CAYMAN CJ Country code of country of incorporation or organization (see ins | structions) |
| | ou uouono) |
| Foreign law characterization (see instructions) | |
| , | |
| RPORATION | tion? |
| Is the transferee foreign corporation a controlled foreign corpora Paperwork Reduction Act Notice, see separate instructions. | tion? Yes X No |
| raverwork reduction act notice, see separate instructions. | Form 326 (Rev. 12-2 |

| Stock and securities Installment obligations, account receivables or similar property Foreign currency or other property denominated in foreign currency Inventory Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b)) Tangible property used in trade or business not listed under another category Intangible property Property to be leased (as described in Temp. Regs. sec. 1.367(a)-4T(c)) Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d)) Transfers of oil and gas were foil and gas wescribed in Temp. Regs. sec. 1.367(a)-4T(d)) Transfers of oil and gas wescribed in Temp. Regs. sec. 1.367(a)-4T(d)) Transfers of oil and gas wescribed in Temp. Regs. sec. | 1,504,04 | | |
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| np. Regs. sec. | | | |
| 367(a)-4T(e)) | | | |
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| her property | | | |
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| orm 926 | (Rev. | 12-2008 |
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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 1.78 % (b) After 1.78 % Type of nonrecognition transaction (see instructions) \triangleright 351 Indicate whether any transfer reported in Part III is subject to any of the following: a Gain recognition under section 904(f)(3) Yes Yes No Yes c Recapture under section 1503(d) d Exchange gain under section 987 Χ Yes X No Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? 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: a Tainted property Yes No Χ Nο Yes Yes No 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)? 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)? b If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ► \$ Was cash the only property transferred? Yes

17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?

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

Form **926** (Rev. 12-2008)

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.

OMB No. 1545-0026

Attachment Sequence No. **128**

| Part U.S. Transferor Information (see instructions) | Identifying number (acc instructions) |
|---|--|
| | Identifying number (see instructions) |
| KENYON COLLEGE | 31-4379507 |
| If the transferor was a corporation, complete questions 1a through a lift the transfer was a section 361(a) or (b) transfer, was the transfer of fewer domestic corporations? b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identifying numbers. | sferor controlled (under section 368(c)) by Yes No Yes No |
| Controlling shareholder | Identifying number |
| | |
| | |
| c If the transferor was a member of an affiliated group filing a cor | |
| corporation? If not, list the name and employer identification number (EIN) of | f the parent corporation: |
| Name of parent corporation | EIN of parent corporation |
| complete questions 2a through 2d. | Yes No actual transferor (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 c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership th securities market? | Yes X No lat is regularly traded on an established |
| Part II Transferee Foreign Corporation Information (see in | structions) |
| Name of transferee (foreign corporation) SAVEA INVESTMENT FUND III C LP | 4 Identifying number, if any FOREIGNUS |
| GRAND CAYMAN CJ Country code of country of incorporation or organization (see in | ND HOUSE |
| 7 Foreign law characterization (see instructions) | |
| CORPORATION | |
| 8 Is the transferee foreign corporation a controlled foreign corpora | ation? Yes X No |
| or Panerwork Reduction Act Notice see senarate instructions | Form 926 (Rev. 12-200 |

| 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 |
|------------------------------------|-----------------------------------|-----------------------------|---|-------------------------------|---------------------------------|
| ash | VAR | | 891,262. | | |
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| ock and | | | | | |
| curities | | | | | |
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| oligations, | | | | | |
| count | | | | | |
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| mar property | | | | | |
| reign currency | | | | | |
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| nominated in | | | | | |
| eign currency | | | | | |
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| veritory | | | | | |
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| sets subject to | | | | | |
| preciation capture (see | | | | | |
| mp. Regs. sec. | | | | | |
| 367(a)-4T(b)) | | | | | |
| ingible property | | | | | |
| sed in trade or usiness not listed | | | | | |
| der another | | | | | |
| itegory | | | | | |
| | | | | | |
| tangible | | | | | |
| operty | | | | | |
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| operty to be | | | | | |
| sed (as | | | | | |
| 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 | | | | | |
| np. Regs. sec. 67(a)-4T(e)) | | | | | |
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| her property | | | | | |
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| | | 1 | | | <u> </u> |
| upplemental li | nformation Required | I To Be Reported (see | e instructions): | | |
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| orm 9 | 26 | (Rev. | 12-2008 |
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|--------------|----|-------|---------|

Part IV Additional Information Regarding Transfer of Property (see instructions)

| 9 E | Enter the transferor's interest in the foreign transferee corporation before and after the transfer: | | |
|--------|--|-----------------|------------------------------|
| (a | a) Before 1.78 % (b) After 1.78 % | | |
| 10 | Type of nonrecognition transaction (see instructions) \blacktriangleright 351 | | |
| b c | Indicate whether any transfer reported in Part III is subject to any of the following: Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 | Yes Yes Yes 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 |
| b 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 | Yes Yes Yes Yes | 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)? | Yes | X No |
| 15a | 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 | 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? | X Yes | ☐ No |
| 17a | Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction? | Yes | X No |
| b | o If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction: | | |
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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

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

OMB No. 1545-0026

Attachment Sequence No. **128**

| Part U.S. Transferor Information (see instructions) | Identifying mumber (coo instructions) |
|---|--|
| | Identifying number (see instructions) |
| KENYON COLLEGE | 31-4379507 |
| If the transferor was a corporation, complete questions 1a throu a If the transfer was a section 361(a) or (b) transfer, was the tran 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 num | sferor controlled (under section 368(c)) by Yes No Yes No |
| | T |
| Controlling shareholder | Identifying number |
| | |
| | |
| | |
| c If the transferor was a member of an affiliated group filing a corcorporation? If not, list the name and employer identification number (EIN) of | 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 complete questions 2a through 2d.a List the name and EIN of the transferor's partnership: | actual transferor (but is not treated as such under section 36 |
| Name of partnership | EIN of partnership |
| DAMAC DADMNEDC ID | 04 2514250 |
| b Did the partner pick up its pro rata share of gain on the transfer c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership th securities market? | Yes X No at is regularly traded on an established |
| Part II Transferee Foreign Corporation Information (see in | |
| Name of transferee (foreign corporation) | 4 Identifying number, if any |
| STEWART ISLAND SUB INVESTORS PTE LTD | FOREIGNUS |
| 6 Address (including country) 9 RAFFLES PLACE #3 | 2-00 |
| SN Country code of country of incorporation or organization (see in: | etructione\ |
| | structions) |
| 7 Foreign law characterization (see instructions) | |
| , | |
| CORPORATION | ntion? |
| Is the transferee foreign corporation a controlled foreign corpora | ation? Yes X No |

| Type of property | (a) Date of transfer | (b) Description of property | (c) Fair market value on date of transfer | (d) Cost or other basis | (e) Gain recognized on transfer |
|---------------------------------|-----------------------------------|-----------------------------|---|-------------------------------|---------------------------------|
| ash | VAR | | 158,324. | | |
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| ock and | | | | | |
| curities | | | | | |
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| stallment | | | | | |
| ligations, | | | | | |
| count | | | | | |
| eivables or nilar property | | | | | |
| mai property | | | | | |
| reign currency | | | | | |
| other property | | | | | |
| nominated in | | | | | |
| eign currency | | | | | |
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| entory | | | | | |
| entory | | | | | |
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| sets subject to | | | | | |
| oreciation | | | | | |
| apture (see | | | | | |
| np. Regs. sec. .67(a)-4T(b)) | | | | | |
| ngible property | | | | | |
| ed in trade or | | | | | |
| siness not listed | | | | | |
| der another egory | | | | | |
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| angible | | | | | |
| pperty | | | | | |
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| anarty to be | | | | | |
| operty to be sed (as | | | | | |
| scribed in | | | | | |
| np. Regs. sec. | | | | | |
| 67(a)-4T(c)) | | | | | |
| operty to be d (as | | | | | |
| scribed in | | | | | |
| np. Regs. sec. | | | | | |
| 67(a)-4T(d)) | | | | | |
| nsfers of oil and | | | | | |
| working interests described in | | | | | |
| ip. Regs. sec. | | | | | |
| 67(a)-4T(e)) | | | | | |
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| ner property | | | | | |
| ioi property | | | | | |
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| Form 926 | (Rev. | 12-2008 |
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Part IV Additional Information Regarding Transfer of Property (see instructions)

| 9 E | inter the transferor's interest in the foreign transferee corporation before and after the transfer: | | |
|--------|--|---------------------|------------------------------|
| (a | a) Before <u>1.78</u> % (b) After <u>1.78</u> % | | |
| 10 | Type of nonrecognition transaction (see instructions) \blacktriangleright 351 | | |
| b c | Indicate whether any transfer reported in Part III is subject to any of the following: Gain recognition under section 904(f)(3) | Yes Yes Yes Yes Yes | X No X No X No X No |
| b 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 | Yes Yes Yes Yes | 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)? | Yes | X No |
| 15a | 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? | X Yes | ☐ No |
| | Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction? | Yes | X No |
| | 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.

OMB No. 1545-0026

Attachment Sequence No. 128

| Part I U.S. Transferor Information (see instructions) | |
|--|--|
| Name of transferor | Identifying number (see instructions) |
| KENYON COLLEGE | 31-4379507 |
| If the transferor was a corporation, complete questions 1a throu a If the transfer was a section 361(a) or (b) transfer, was the tran 5 or fewer domestic corporations? | isferor controlled (under section 368(c)) by Yes No |
| b Did the transferor remain in existence after the transfer? | |
| If not, list the controlling shareholder(s) and their identifying nun | nber(s): |
| Controlling shareholder | Identifying number |
| | |
| | |
| c If the transferor was a member of an affiliated group filing a corcorporation? If not, list the name and employer identification number (EIN) of | Yes No |
| Name of parent corporation | EIN of parent corporation |
| 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 c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership the securities market? | Yes X No lat is regularly traded on an established |
| Part II Transferee Foreign Corporation Information (see in | structions) |
| Name of transferee (foreign corporation) BRAZIL FUND B Address (including country) AV ATAULFO DE PAIV. | 4 Identifying number, if any FOREIGNUS A 255 9 ANDAR |
| RIO DE JANEIRO BR 6 Country code of country of incorporation or organization (see in | |
| BR | |
| 7 Foreign law characterization (see instructions) | |
| CORPORATION | |
| 8 Is the transferee foreign corporation a controlled foreign corpora | |
| or Paperwork Reduction Act Notice, see separate instructions. | Form 926 (Rev. 12- |

| 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 | | 252,687. | | |
| tock and ecurities | | | | | |
| nstallment bligations, ccount eceivables or imilar property | | | | | |
| oreign currency r other property enominated in oreign currency | | | | | |
| nventory - | | | | | |
| Assets subject to lepreciation ecapture (see emp. Regs. sec367(a)-4T(b)) | | | | | |
| angible property used in trade or cusiness not listed under another category | | | | | |
| ntangible property | | | | | |
| Property to be eased (as lescribed in emp. Regs. sec | | | | | |
| Property to be old (as escribed in femp. Regs. sec367(a)-4T(d)) | | | | | |
| ransfers of oil and las working interests as described in remp. Regs. sec367(a)-4T(e)) | | | | | |
| Other property | | | | | |

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 1.78 % (b) After 1.78 % | | |
| 10 | Type of nonrecognition transaction (see instructions) \blacktriangleright 351 | | |
| I | Indicate whether any transfer reported in Part III is subject to any of the following: Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 | Yes Yes Yes Yes Yes | X No |
| 12 | Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? | Yes | X No |
| I | 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 | Yes Yes | |
| 14 | Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? | Yes | X No |
| 15 | 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 |
| I | 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 |
| | If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction: | | |
| | | | |
| | | Form 926 (R | Pev 12-2009 |

Form **926**

(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**

| Name of transferor | Identifying number (see instructions) |
|--|---|
| KENYON COLLEGE | 31-4379507 |
| If the transferor was a corporation, complete questions 1a through | · |
| a If the transfer was a section 361(a) or (b) transfer, was the tran | • |
| 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 nur | |
| in not, list the controlling shareholder(3) and their identifying har | |
| Controlling shareholder | Identifying number |
| | |
| | |
| | |
| c If the transferor was a member of an affiliated group filing a co | nsolidated return, was it the parent |
| | |
| corporation? If not, list the name and employer identification number (EIN) o | f the parent corporation: |
| Name of parent corporation | EIN of parent corporation |
| | _ |
| d Have basis adjustments under section 367(a)(5) been made? 2 If the transferor was a partner in a partnership that was the | Yes No actual transferor (but is not treated as such under section 367 |
| complete questions 2a through 2d. | |
| a List the name and EIN of the transferor's partnership: | |
| Name of partnership | EIN of partnership |
| | |
| ADAMAS PARTNERSHIP LP | 04-3514358 |
| b Did the partner pick up its pro rata share of gain on the transfer | |
| c Is the partner disposing of its entire interest in the partnership? | |
| d Is the partner disposing of an interest in a limited partnership the | |
| securities market? | |
| Name of transferee (foreign corporation) | 4 Identifying number, if any |
| BVP-1 CAYMAN LTD | FOREIGNUS |
| 5 Address (including country) P.O. BOX 309 | |
| GRAND CAYMAN CJ | |
| 6 Country code of country of incorporation or organization (see in | nstructions) |
| CJ | |
| Foreign law characterization (see instructions) | |
| CORPORATION | |
| 8 Is the transferee foreign corporation a controlled foreign corporation | ation? Yes X No |
| or Paperwork Reduction Act Notice, see separate instructions. | Form 926 (Rev. 12-2008 |

Part III Information Regarding Transfer of Property (see instructions)

| Type of property | (a) Date of transfer | (b) Description of property | (c) Fair market value on date of transfer | (d) Cost or other basis | (e) Gain recognized on transfer |
|--|----------------------------|-----------------------------|---|-------------------------------|---------------------------------|
| ash | VAR | | 457,175. | | |
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| ligations, count | | | | | |
| ceivables or | | | | | |
| milar property | | | | | |
| | | | | | |
| reign currency | | | | | |
| other property | | | | | |
| nominated in reign currency | | | | | |
| reign currency | | | | | |
| | | | | | |
| ventory | | | | | |
| venitory – | | | | | |
| | | | | | |
| sets subject to | | | | | |
| preciation | | | | | |
| capture (see | | | | | |
| emp. Regs. sec. 367(a)-4T(b)) | | | | | - |
| angible property | | | | | |
| sed in trade or | | | | | |
| usiness not listed | | | | | |
| nder another | | | | | |
| ategory | | | | | |
| | | | | | |
| tangible | | | | | |
| operty | | | | | |
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| operty to be | | | | | |
| ased (as | | | | | |
| escribed in emp. 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 | | | | | |
| np. Regs. sec. | | | | | |
| 67(a)-4T(e)) | | | | | |
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Part IV Additional Information Regarding Transfer of Property (see instructions)

| 9 E | inter the transferor's interest in the foreign transferee corporation before and after the transfer: | | |
|-----|---|--------|------|
| (; | a) Before <u>1.78</u> % (b) After <u>1.78</u> % | | |
| 10 | Type of nonrecognition transaction (see instructions) \blacktriangleright 351 | | |
| 11 | Indicate whether any transfer reported in Part III is subject to any of the following: | | |
| а | Gain recognition under section 904(f)(3) | Yes | X No |
| b | | Yes | X No |
| С | | Yes | X No |
| d | | Yes | X No |
| 12 | Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? | Yes | X No |
| 13 | Indicate whether the transferor was required to recognize income under Temporary Regulations sections 1.367(a)-4T through 1.367(a)-6T for any of the following: | | |
| а | Tainted property | Yes | X No |
| b | Depreciation recapture | Yes | X No |
| С | Branch loss recapture | Yes | X No |
| | Any other income recognition provision contained in the above-referenced regulations | Yes | X No |
| 14 | Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? | Yes | X No |
| 15a | Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)? | Yes | X No |
| b | If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred > \$ | | |
| 16 | Was cash the only property transferred? | X Yes | ☐ No |
| 17a | 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: | | |
| | | | |
| | | 200 :- | |

(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.

OMB No. 1545-0026

Attachment Sequence No. **128**

| Part U.S. Transferor Information (see instructions) Name of transferor | Identifying muskey (200 instructions) |
|--|--|
| | Identifying number (see instructions) |
| KENYON COLLEGE | 31-4379507 |
| If the transferor was a corporation, complete questions 1a the all the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations? b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identifying not the controlling shareholder identifying not shareho | ansferor controlled (under section 368(c)) by Yes No Yes No |
| Controlling shareholder | Identifying number |
| - Controlling Shareholder | identifying number |
| | |
| | |
| c If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) | Yes No |
| Name of parent corporation | EIN of parent corporation |
| complete questions 2a through 2d. | Yes No ne actual transferor (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 |
| | |
| DAMAS PARTNERS LP b Did the partner pick up its pro rata share of gain on the transf c Is the partner disposing of its entire interest in the partnership d Is the partner disposing of an interest in a limited partnership securities market? | ?? |
| Part II Transferee Foreign Corporation Information (see | instructions) |
| Name of transferee (foreign corporation) SVP-1 CAYMAN III LTD | 4 Identifying number, if any FOREIGNUS |
| 5 Address (including country) P.O. BOX 309 GRAND CAYMAN CJ | |
| 6 Country code of country of incorporation or organization (see | instructions) |
| 7 Foreign law characterization (see instructions) | |
| ORPORATION | |
| 3 Is the transferee foreign corporation a controlled foreign corp | oration? Yes X No |
| or Panerwork Reduction Act Notice see senarate instructions | Oration: |

| 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 |
|--------------------------------------|----------------------------|-----------------------------|---|-------------------------------|---------------------------------|
| ash | VAR | | 345,622. | | |
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| ceivables or milar property | | | | | |
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| ssets subject to | | | | | |
| preciation | | | | | |
| capture (see emp. Regs. sec. | | | | | |
| 367(a)-4T(b)) | | | | | |
| angible property | | | | | |
| sed in trade or siness not listed | | | | | |
| nder another | | | | | |
| ategory | | | | | |
| C 9. L . | | | | | |
| tangible operty | | | | | |
| -1 | | | | | |
| operty to be | | | | | |
| ased (as | | | | | |
| escribed in emp. Regs. sec. | | | | | |
| 367(a)-4T(c)) | | | | | |
| operty to be | | | | | |
| old (as escribed in | | | | | |
| emp. Regs. sec. | | | | | |
| 367(a)-4T(d)) | | | | | |
| ansfers of oil and | | | | | |
| s working interests described in | | | | | |
| Temp. Regs. sec. | | | | | |
| 367(a)-4T(e)) | | | | | |
| | | | | | |
| her property | | | | | |
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| | l . | 1 | 1 | | |

| 9 E | nter the transferor's interest in the foreign transferee corporation before and after the transfer: | | |
|-------------------|---|---------------------|--------------------------|
| (a | a) Before 1.78 % (b) After 1.78 % | | |
| 10 | Type of nonrecognition transaction (see instructions) \blacktriangleright 351 | | |
| b c | Indicate whether any transfer reported in Part III is subject to any of the following: Gain recognition under section 904(f)(3) Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? | Yes Yes Yes Yes Yes | X No X No X No X No X No |
| 13 a b 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 | Yes Yes Yes Yes | 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)? | Yes | X No |
| 15a | Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)? | Yes | X No |
| b | If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$ | | |
| 16 | Was cash the only property transferred? | X Yes | No |
| 17a | 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: | | |
| _ | | | |
| | | orm 926 (Re | ev. 12-2008) |

(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.

OMB No. 1545-0026

Attachment Sequence No. **128**

| Part I U.S. Transferor Information (see instructions) | Identification and the control of th |
|---|--|
| lame of transferor | Identifying number (see instructions) |
| KENYON COLLEGE | 31-4379507 |
| If the transferor was a corporation, complete questions 1a through a lift the transfer was a section 361(a) or (b) transfer, was the transfer or fewer domestic corporations? b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identifying numbers. | sferor controlled (under section 368(c)) by Yes No Yes No |
| | I |
| Controlling shareholder | Identifying number |
| | |
| | |
| c If the transferor was a member of an affiliated group filing a cor | nsolidated return, was it the parent |
| a arma ration? | Yes No |
| Name of parent corporation | EIN of parent corporation |
| | |
| ${f d}$ 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. a List the name and EIN of the transferor's partnership: | actual transferor (but is not treated as such under section 367 |
| Name of partnership | EIN of partnership |
| DAMAS PARTNERS LP | 04-3514358 |
| b Did the partner pick up its pro rata share of gain on the transfer c c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership th securities market? | of partnership assets? |
| art II Transferee Foreign Corporation Information (see in | |
| Name of transferee (foreign corporation) | 4 Identifying number, if any |
| TOLEMY RETAIL LP | FOREIGNUS |
| | LAND HOUSE |
| EORGE TOWN GRAND CAYMAN CJ Country code of country of incorporation or organization (see in | structions) |
| 7 Foreign law characterization (see instructions) | |
| , | |
| ORPORATION | Section 2 |
| Is the transferee foreign corporation a controlled foreign corpora | ation? Yes X No |

| Type of property | (a) Date of transfer | (b) Description of property | (c) Fair market value on date of transfer | (d) Cost or other basis | (e) Gain recognized on transfer |
|------------------------------------|----------------------------|-----------------------------|---|-------------------------------|---------------------------------|
| ash | VAR | | 231,073. | | |
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| ssets subject to | | | | | |
| preciation | | | | | |
| capture (see | | | | | |
| emp. Regs. sec. 367(a)-4T(b)) | | | | | |
| angible property | | | | | |
| sed in trade or | | | | | |
| usiness not listed ander another | | | | | |
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| ased (as | | | | | |
| escribed in emp. Regs. sec. | | | | | |
| 367(a)-4T(c)) | | | | | |
| operty to be | | | | | |
| old (as escribed in | | | | | |
| emp. Regs. sec. | | | | | |
| 1.367(a)-4T(d)) | | | | | |
| ansfers of oil and | | | | | |
| s working interests s described in | | | | | |
| mp. Regs. sec. | | | | | |
| 367(a)-4T(e)) | | | | | |
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| | formation Doquirod | I To Be Reported (see | inatrustiana). | | |

| 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:

| • | and the transferor of interest in the foreign transferoe sorporation before and alter the transfer. | | |
|--------|--|---------|---------------------|
| (a | a) Before <u>1.78</u> % (b) After <u>1.78</u> % | | |
| 10 | Type of nonrecognition transaction (see instructions) ▶ 351 | | |
| b | Recapture under section 1503(d) | Yes | 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 |
| b 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 | Yes Yes | 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)? | 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 |
| 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 |
| 17a | 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: | | |
| | | | |
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