

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

**2018**

For calendar year 2018 or other tax year beginning JUL 1, 2018, and ending JUN 30, 2019

▶ Go to [www.irs.gov/Form990T](http://www.irs.gov/Form990T) for instructions and the latest information.

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

Department of the Treasury  
Internal Revenue Service

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

<p><b>A</b> <input type="checkbox"/> Check box if address changed</p> <p><b>B</b> Exempt under section  <input checked="" type="checkbox"/> 501(c)(3) <input type="checkbox"/> 408(e) <input type="checkbox"/> 220(e)  <input type="checkbox"/> 408A <input type="checkbox"/> 530(a)  <input type="checkbox"/> 529(a)</p>	Print or Type	<p>Name of organization ( <input type="checkbox"/> Check box if name changed and see instructions.)  <b>ORANGE COUNTY COMMUNITY FOUNDATION</b></p> <p>Number, street, and room or suite no. If a P.O. box, see instructions.  <b>4041 MACARTHUR BLVD., SUITE 510</b></p> <p>City or town, state or province, country, and ZIP or foreign postal code  <b>NEWPORT BEACH, CA 92660</b></p>	<p><b>D</b> Employer identification number (Employees' trust, see instructions.)  <b>33-0378778</b></p> <p><b>E</b> Unrelated business activity code (See instructions.)  <b>531390</b></p>
---	---------------------	--	---

<p><b>C</b> Book value of all assets at end of year  <b>329,675,877.</b></p>	<p><b>F</b> Group exemption number (See instructions.) ▶</p>	<p><b>G</b> Check organization type ▶ <input checked="" type="checkbox"/> 501(c) corporation <input type="checkbox"/> 501(c) trust <input type="checkbox"/> 401(a) trust <input type="checkbox"/> Other trust</p>
--	--	---

**H** Enter the number of the organization's unrelated trades or businesses. ▶ 1 Describe the only (or first) unrelated trade or business here ▶ SEE STATEMENT 1. If only one, complete Parts I-V. If more than one, describe the first in the blank space at the end of the previous sentence, complete Parts I and II, complete a Schedule M for each additional trade or business, then complete Parts III-V.

**I** During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group? ..... ▶  Yes  No  
 If "Yes," enter the name and identifying number of the parent corporation. ▶

**J** The books are in care of ▶ SHELLEY HOSS, PRESIDENT Telephone number ▶ 949-553-4202

<b>Part I Unrelated Trade or Business Income</b>	(A) Income	(B) Expenses	(C) Net
<b>1a</b> Gross receipts or sales			
<b>b</b> Less returns and allowances			
<b>c</b> Balance	<b>1c</b>		
<b>2</b> Cost of goods sold (Schedule A, line 7)	<b>2</b>		
<b>3</b> Gross profit. Subtract line 2 from line 1c	<b>3</b>		
<b>4a</b> Capital gain net income (attach Schedule D)	<b>4a</b> 179,639.		179,639.
<b>b</b> Net gain (loss) (Form 4797, Part II, line 17) (attach Form 4797)	<b>4b</b>		
<b>c</b> Capital loss deduction for trusts	<b>4c</b>		
<b>5</b> Income (loss) from a partnership or an S corporation (attach statement)	<b>5</b> 561,785.	STMT 3	561,785.
<b>6</b> Rent income (Schedule C)	<b>6</b>		
<b>7</b> Unrelated debt-financed income (Schedule E)	<b>7</b>		
<b>8</b> Interest, annuities, royalties, and rents from a controlled organization (Schedule F)	<b>8</b>		
<b>9</b> Investment income of a section 501(c)(7), (9), or (17) organization (Schedule G)	<b>9</b>		
<b>10</b> Exploited exempt activity income (Schedule I)	<b>10</b>		
<b>11</b> Advertising income (Schedule J)	<b>11</b>		
<b>12</b> Other income (See instructions; attach schedule)	<b>12</b>		
<b>13 Total.</b> Combine lines 3 through 12	<b>13</b> 741,424.		741,424.

<b>Part II Deductions Not Taken Elsewhere</b> (See instructions for limitations on deductions.) (Except for contributions, deductions must be directly connected with the unrelated business income.)			
<b>14</b> Compensation of officers, directors, and trustees (Schedule K)	<b>14</b>		
<b>15</b> Salaries and wages	<b>15</b>		
<b>16</b> Repairs and maintenance	<b>16</b>		
<b>17</b> Bad debts	<b>17</b>		
<b>18</b> Interest (attach schedule) (see instructions)	<b>18</b>		
<b>19</b> Taxes and licenses	<b>19</b>		
<b>20</b> Charitable contributions (See instructions for limitation rules)	<b>20</b> SEE STATEMENT 5		0.
<b>21</b> Depreciation (attach Form 4562)	<b>21</b>		
<b>22</b> Less depreciation claimed on Schedule A and elsewhere on return	<b>22a</b>	<b>22b</b>	
<b>23</b> Depletion	<b>23</b>		
<b>24</b> Contributions to deferred compensation plans	<b>24</b>		
<b>25</b> Employee benefit programs	<b>25</b>		
<b>26</b> Excess exempt expenses (Schedule I)	<b>26</b>		
<b>27</b> Excess readership costs (Schedule J)	<b>27</b>		
<b>28</b> Other deductions (attach schedule)	<b>28</b> SEE STATEMENT 4		17,600.
<b>29 Total deductions.</b> Add lines 14 through 28	<b>29</b>		17,600.
<b>30</b> Unrelated business taxable income before net operating loss deduction. Subtract line 29 from line 13	<b>30</b>		723,824.
<b>31</b> Deduction for net operating loss arising in tax years beginning on or after January 1, 2018 (see instructions)	<b>31</b>		
<b>32</b> Unrelated business taxable income. Subtract line 31 from line 30	<b>32</b>		723,824.

**Part III Total Unrelated Business Taxable Income**

33	Total of unrelated business taxable income computed from all unrelated trades or businesses (see instructions)	33	723,824.
34	Amounts paid for disallowed fringes	34	
35	Deduction for net operating loss arising in tax years beginning before January 1, 2018 (see instructions) <b>STMT 6</b>	35	723,824.
36	Total of unrelated business taxable income before specific deduction. Subtract line 35 from the sum of lines 33 and 34	36	
37	Specific deduction (Generally \$1,000, but see line 37 instructions for exceptions)	37	1,000.
38	<b>Unrelated business taxable income.</b> Subtract line 37 from line 36. If line 37 is greater than line 36, enter the smaller of zero or line 36	38	0.

**Part IV Tax Computation**

39	<b>Organizations Taxable as Corporations.</b> Multiply line 38 by 21% (0.21)	39	0.
40	<b>Trusts Taxable at Trust Rates.</b> See instructions for tax computation. Income tax on the amount on line 38 from: <input type="checkbox"/> Tax rate schedule or <input type="checkbox"/> Schedule D (Form 1041)	40	
41	<b>Proxy tax.</b> See instructions	41	
42	Alternative minimum tax (trusts only)	42	
43	<b>Tax on Noncompliant Facility Income.</b> See instructions	43	
44	<b>Total.</b> Add lines 41, 42, and 43 to line 39 or 40, whichever applies	44	0.

**Part V Tax and Payments**

45a	Foreign tax credit (corporations attach Form 1118; trusts attach Form 1116)	45a	
b	Other credits (see instructions)	45b	
c	General business credit. Attach Form 3800	45c	
d	Credit for prior year minimum tax (attach Form 8801 or 8827)	45d	
e	<b>Total credits.</b> Add lines 45a through 45d	45e	
46	Subtract line 45e from line 44	46	0.
47	Other taxes. Check if from: <input type="checkbox"/> Form 4255 <input type="checkbox"/> Form 8611 <input type="checkbox"/> Form 8697 <input type="checkbox"/> Form 8866 <input type="checkbox"/> Other (attach schedule)	47	
48	<b>Total tax.</b> Add lines 46 and 47 (see instructions)	48	0.
49	2018 net 965 tax liability paid from Form 965-A or Form 965-B, Part II, column (k), line 2	49	0.
50a	Payments: A 2017 overpayment credited to 2018	50a	21,280.
b	2018 estimated tax payments	50b	
c	Tax deposited with Form 8868	50c	
d	Foreign organizations: Tax paid or withheld at source (see instructions)	50d	
e	Backup withholding (see instructions)	50e	
f	Credit for small employer health insurance premiums (attach Form 8941)	50f	
g	Other credits, adjustments, and payments: <input type="checkbox"/> Form 2439 <input type="checkbox"/> Form 4136 <input type="checkbox"/> Other Total	50g	
51	<b>Total payments.</b> Add lines 50a through 50g	51	21,280.
52	Estimated tax penalty (see instructions). Check if Form 2220 is attached <input type="checkbox"/>	52	
53	<b>Tax due.</b> If line 51 is less than the total of lines 48, 49, and 52, enter amount owed	53	
54	<b>Overpayment.</b> If line 51 is larger than the total of lines 48, 49, and 52, enter amount overpaid	54	21,280.
55	Enter the amount of line 54 you want: <b>Credited to 2019 estimated tax</b> 21,280.   <b>Refunded</b>	55	0.

**Part VI Statements Regarding Certain Activities and Other Information** (see instructions)

56	At any time during the 2018 calendar year, did the organization have an interest in or a signature or other authority over a financial account (bank, securities, or other) in a foreign country? If "Yes," the organization may have to file FinCEN Form 114, Report of Foreign Bank and Financial Accounts. If "Yes," enter the name of the foreign country here <b>CAYMAN ISLANDS</b>	Yes	No
57	During the tax year, did the organization receive a distribution from, or was it the grantor of, or transferor to, a foreign trust? If "Yes," see instructions for other forms the organization may have to file.		X
58	Enter the amount of tax-exempt interest received or accrued during the tax year \$		

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

**Sign Here**  
 Signature of officer: \_\_\_\_\_ Date: \_\_\_\_\_ Title: **PRESIDENT**  
 May the IRS discuss this return with the preparer shown below (see instructions)?  Yes  No

**Paid Preparer Use Only**  
 Print/Type preparer's name: **PATRICIA J. MAYER**  
 Preparer's signature: \_\_\_\_\_ Date: \_\_\_\_\_  
 Check  if self-employed PTIN: **P00188643**  
 Firm's name: **MOSS ADAMS LLP** Firm's EIN: **91-0189318**  
 4747 EXECUTIVE DR SUITE 1300  
 Firm's address: **SAN DIEGO, CA 92121** Phone no. **858-627-1400**

**Schedule A - Cost of Goods Sold.** Enter method of inventory valuation ► **N/A**

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

**Schedule C - Rent Income (From Real Property and Personal Property Leased With Real Property)**

(see instructions)

1. Description of property

(1)
(2)
(3)
(4)

2. Rent received or accrued

(a) From personal property (if the percentage of rent for personal property is more than 10% but not more than 50%)	(b) From real and personal property (if the percentage of rent for personal property exceeds 50% or if the rent is based on profit or income)	3(a) Deductions directly connected with the income in columns 2(a) and 2(b) (attach schedule)
(1)		
(2)		
(3)		
(4)		
Total	0.	Total

(c) **Total income.** Add totals of columns 2(a) and 2(b). Enter  
here and on page 1, Part I, line 6, column (A) .....

(b) **Total deductions.**  
Enter here and on page 1,  
Part I, line 6, column (B) ... 0.

**Schedule E - Unrelated Debt-Financed Income** (see instructions)

1. Description of debt-financed property	2. Gross income from or allocable to debt- financed property	3. Deductions directly connected with or allocable to debt-financed property	
		(a) Straight line depreciation (attach schedule)	(b) Other deductions (attach schedule)
(1)			
(2)			
(3)			
(4)			
4. Amount of average acquisition debt on or allocable to debt-financed property (attach schedule)	5. Average adjusted basis of or allocable to debt-financed property (attach schedule)	6. Column 4 divided by column 5	7. Gross income reportable (column 2 x column 6)
(1)		%	
(2)		%	
(3)		%	
(4)		%	
<b>Totals</b> .....		Enter here and on page 1, Part I, line 7, column (A).	Enter here and on page 1, Part I, line 7, column (B).
Total dividends-received deductions included in column 8 .....		0.	0.
			0.

Form 990-T (2018)

**Schedule F - Interest, Annuities, Royalties, and Rents From Controlled Organizations** (see instructions)

1. Name of controlled organization	2. Employer identification number	Exempt Controlled Organizations			
		3. Net unrelated income (loss) (see instructions)	4. Total of specified payments made	5. Part of column 4 that is included in the controlling organization's gross income	6. Deductions directly connected with income in column 5
(1)					
(2)					
(3)					
(4)					

**Nonexempt Controlled Organizations**

7. Taxable income	8. Net unrelated income (loss) (see instructions)	9. Total of specified payments made	10. Part of column 9 that is included in the controlling organization's gross income	11. Deductions directly connected with income in column 10
(1)				
(2)				
(3)				
(4)				
			Add columns 5 and 10. Enter here and on page 1, Part I, line 8, column (A).	Add columns 6 and 11. Enter here and on page 1, Part I, line 8, column (B).
<b>Totals</b> .....			0.	0.

**Schedule G - Investment Income of a Section 501(c)(7), (9), or (17) Organization** (see instructions)

1. Description of income	2. Amount of income	3. Deductions directly connected (attach schedule)	4. Set-asides (attach schedule)	5. Total deductions and set-asides (col. 3 plus col. 4)
(1)				
(2)				
(3)				
(4)				
		Enter here and on page 1, Part I, line 9, column (A).		Enter here and on page 1, Part I, line 9, column (B).
<b>Totals</b> .....		0.		0.

**Schedule I - Exploited Exempt Activity Income, Other Than Advertising Income** (see instructions)

1. Description of exploited activity	2. Gross unrelated business income from trade or business	3. Expenses directly connected with production of unrelated business income	4. Net income (loss) from unrelated trade or business (column 2 minus column 3). If a gain, compute cols. 5 through 7.	5. Gross income from activity that is not unrelated business income	6. Expenses attributable to column 5	7. Excess exempt expenses (column 6 minus column 5, but not more than column 4).
(1)						
(2)						
(3)						
(4)						
		Enter here and on page 1, Part I, line 10, col. (A).	Enter here and on page 1, Part I, line 10, col. (B).			Enter here and on page 1, Part II, line 26.
<b>Totals</b> .....		0.	0.			0.

**Schedule J - Advertising Income** (see instructions)

**Part I Income From Periodicals Reported on a Consolidated Basis**

1. Name of periodical	2. Gross advertising income	3. Direct advertising costs	4. Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5. Circulation income	6. Readership costs	7. Excess readership costs (column 6 minus column 5, but not more than column 4).
(1)						
(2)						
(3)						
(4)						
<b>Totals</b> (carry to Part II, line (5)) .....		0.	0.			0.

**Part II** **Income From Periodicals Reported on a Separate Basis** (For each periodical listed in Part II, fill in columns 2 through 7 on a line-by-line basis.)

1. Name of periodical	2. Gross advertising income	3. Direct advertising costs	4. Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5. Circulation income	6. Readership costs	7. Excess readership costs (column 6 minus column 5, but not more than column 4).
(1)						
(2)						
(3)						
(4)						
<b>Totals from Part I</b> .....	<b>0.</b>	<b>0.</b>				<b>0.</b>
<b>Totals, Part II (lines 1-5)</b> .....	Enter here and on page 1, Part I, line 11, col. (A). <b>0.</b>	Enter here and on page 1, Part I, line 11, col. (B). <b>0.</b>				Enter here and on page 1, Part II, line 27. <b>0.</b>

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

1. Name	2. Title	3. Percent of time devoted to business	4. Compensation attributable to unrelated business
(1)		%	
(2)		%	
(3)		%	
(4)		%	
<b>Total.</b> Enter here and on page 1, Part II, line 14 .....			<b>0.</b>

---

FORM 990-T      DESCRIPTION OF ORGANIZATION'S PRIMARY UNRELATED      STATEMENT 1  
BUSINESS ACTIVITY

---

SHAREHOLDER IN LIMITED PARTNERSHIPS

TO FORM 990-T, PAGE 1

THE NET OPERATING LOSS CARRYOVER GENERATED DURING THE 6/30/2018 TAX YEAR WAS INCREASED FROM \$542,339 (WHICH WAS THE LOSS APPEARING ON THE ORIGINALLY FILED FORM 990-T) TO \$550,039, A DIFFERENCE OF \$7,700. THE INCREASE REPRESENTS THE AMOUNT OF QUALIFIED TRANSPORTATION FRINGE BENEFITS (WHICH WAS REQUIRED TO BE REPORTED AS UNRELATED BUSINESS INCOME AT THE TIME THE 6/30/2018 FORM 990-T WAS FILED), BUT WHICH HAS SINCE BEEN RETROACTIVELY REVERSED IN ACCORDANCE WITH THE SIGNING OF THE "FURTHER CONSOLIDATED APPROPRIATIONS ACT, 2020" ON DECEMBER 20, 2019.

FORM 990-T

INCOME (LOSS) FROM PARTNERSHIPS

STATEMENT 3

DESCRIPTION	NET INCOME OR (LOSS)
CAPITAL DYNAMICS REAL ESTATE FEIN 20-5748590 - ORDINARY BUSINESS INCOME (LOSS)	-1,260.
CAPITAL DYNAMICS REAL ESTATE FEIN 20-5748590 - NET RENTAL REAL ESTATE INCOME	-507.
CAPITAL DYNAMICS REAL ESTATE FEIN 20-5748590 - OTHER INCOME (LOSS)	-84.
HARVEST MLP INCOME FUND LLC FEIN 27-2968896 - ORDINARY BUSINESS INCOME (LOSS)	1,084,170.
KDF COMMUNITIES - CITY TOWERS, LLC FEIN 43-20210 - ORDINARY BUSINESS INCOME	774.
KDF COMMUNITIES - CITY TOWERS, LLC FEIN 43-20210 - NET RENTAL REAL ESTATE INCOME	-119.
RCP SECONDARY OPPORTUNITY FUND II, LP FEIN 90-08 - ORDINARY BUSINESS INCOME	4,143.
DOVER STREET FEIN 47-5125540 - ORDINARY BUSINESS INCOME (LOSS)	-29,120.
DOVER STREET FEIN 47-5125540 - NET RENTAL REAL ESTATE INCOME	6.
DOVER STREET FEIN 47-5125540 - INTEREST INCOME	5,033.
DOVER STREET FEIN 47-5125540 - DIVIDEND INCOME	7,300.
DOVER STREET FEIN 47-5125540 - ROYALTIES	41.
DOVER STREET FEIN 47-5125540 - OTHER INCOME (LOSS)	7,643.
US RESEARCH EQUITY EXTENDED FUND FEIN 81-0885340 - ORDINARY BUSINESS INCOME	999.
DENHAM OIL & GAS FUND FEIN 33-0378778 - ORDINARY BUSINESS INCOME (LOSS)	-246,447.
DENHAM OIL & GAS FUND FEIN 33-0378778 - OTHER INCOME (LOSS)	-10,960.
ENCAP ENERGY CAPITAL FUND XI, LP FEIN 81-4648210 - ORDINARY BUSINESS INCOME	-23,300.
CANNON HERITAGE LIMITED PARTNERSHIP FEIN 45-0507 - ORDINARY BUSINESS INCOME	-981.
ENCAP FLATROCK MIDSTREAM FUND FEIN 82-2890021 - ORDINARY BUSINESS INCOME (LOSS)	-171,147.
H.I.G. REALTY PARTNERS III (ONSHORE), LP FEIN 47-4364220 - ORDINARY BUSINESS INCOME	-28,500.
H.I.G. REALTY PARTNERS III (ONSHORE), LP FEIN 47-4364220 - NET RENTAL REAL ESTATE INCOME	-35,899.
<b>TOTAL INCLUDED ON FORM 990-T, PAGE 1, LINE 5</b>	<b>561,785.</b>



FORM 990-T

OTHER DEDUCTIONS

STATEMENT 4

DESCRIPTION

AMOUNT

ACCOUNTING FEES

17,600.

TOTAL TO FORM 990-T, PAGE 1, LINE 28

17,600.

FORM 990-T CONTRIBUTIONS SUMMARY STATEMENT 5

QUALIFIED CONTRIBUTIONS SUBJECT TO 100% LIMIT

CARRYOVER OF PRIOR YEARS UNUSED CONTRIBUTIONS	
FOR TAX YEAR 2013	1,584
FOR TAX YEAR 2014	55,668,425
FOR TAX YEAR 2015	111,013,754
FOR TAX YEAR 2016	54,559,380
FOR TAX YEAR 2017	76,409,597

TOTAL CARRYOVER	297,652,740
TOTAL CURRENT YEAR 10% CONTRIBUTIONS	

TOTAL CONTRIBUTIONS AVAILABLE	297,652,740
TAXABLE INCOME LIMITATION AS ADJUSTED	0

EXCESS 10% CONTRIBUTIONS	297,652,740
EXCESS 100% CONTRIBUTIONS	0
TOTAL EXCESS CONTRIBUTIONS	297,652,740

ALLOWABLE CONTRIBUTIONS DEDUCTION		0
-----------------------------------	--	---

TOTAL CONTRIBUTION DEDUCTION		0
------------------------------	--	---

FORM 990-T NET OPERATING LOSS DEDUCTION STATEMENT 6

TAX YEAR	LOSS SUSTAINED	LOSS PREVIOUSLY APPLIED	LOSS REMAINING	AVAILABLE THIS YEAR
06/30/12	40,800.	40,800.	0.	0.
06/30/13	61,160.	6,811.	54,349.	54,349.
06/30/14	31,369.	0.	31,369.	31,369.
06/30/16	89,287.	0.	89,287.	89,287.
06/30/17	172,467.	0.	172,467.	172,467.
06/30/18	550,039.	0.	550,039.	550,039.
NOL CARRYOVER AVAILABLE THIS YEAR			897,511.	897,511.

**Capital Gains and Losses**  
 ▶ Attach to Form 1120, 1120-C, 1120-F, 1120-FSC, 1120-H, 1120-IC-DISC, 1120-L,  
 1120-ND, 1120-PC, 1120-POL, 1120-REIT, 1120-RIC, 1120-SF, or certain Forms 990-T.  
 ▶ Go to [www.irs.gov/Form1120](http://www.irs.gov/Form1120) for instructions and the latest information.

**2018**

Name **ORANGE COUNTY COMMUNITY FOUNDATION** Employer identification number **33-0378778**

**Part I Short-Term Capital Gains and Losses** (See instructions.)

See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part I, line 2, column (g)	(h) Gain or (loss). Subtract column (e) from column (d) and combine the result with column (g)
<b>1a</b> Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 1b .....				
<b>1b</b> Totals for all transactions reported on Form(s) 8949 with <b>Box A</b> checked .....				
<b>2</b> Totals for all transactions reported on Form(s) 8949 with <b>Box B</b> checked .....				
<b>3</b> Totals for all transactions reported on Form(s) 8949 with <b>Box C</b> checked .....	1,795.	9,559.		-7,764.
<b>4</b> Short-term capital gain from installment sales from Form 6252, line 26 or 37 .....				4
<b>5</b> Short-term capital gain or (loss) from like-kind exchanges from Form 8824 .....				5
<b>6</b> Unused capital loss carryover (attach computation) .....				6 ( )
<b>7</b> Net short-term capital gain or (loss). Combine lines 1a through 6 in column h .....				7 -7,764.

**Part II Long-Term Capital Gains and Losses** (See instructions.)

See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part II, line 2, column (g)	(h) Gain or (loss). Subtract column (e) from column (d) and combine the result with column (g)
<b>8a</b> Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b .....				
<b>8b</b> Totals for all transactions reported on Form(s) 8949 with <b>Box D</b> checked .....				
<b>9</b> Totals for all transactions reported on Form(s) 8949 with <b>Box E</b> checked .....				
<b>10</b> Totals for all transactions reported on Form(s) 8949 with <b>Box F</b> checked .....	45,216.			45,216.
<b>11</b> Enter gain from Form 4797, line 7 or 9 .....				11 142,187.
<b>12</b> Long-term capital gain from installment sales from Form 6252, line 26 or 37 .....				12
<b>13</b> Long-term capital gain or (loss) from like-kind exchanges from Form 8824 .....				13
<b>14</b> Capital gain distributions .....				14
<b>15</b> Net long-term capital gain or (loss). Combine lines 8a through 14 in column h .....				15 187,403.

**Part III Summary of Parts I and II**

<b>16</b> Enter excess of net short-term capital gain (line 7) over net long-term capital loss (line 15) .....	16	
<b>17</b> Net capital gain. Enter excess of net long-term capital gain (line 15) over net short-term capital loss (line 7) .....	17	179,639.
<b>18</b> Add lines 16 and 17. Enter here and on Form 1120, page 1, line 8, or the proper line on other returns. ....	18	179,639.

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

# Sales and Other Dispositions of Capital Assets

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

Name(s) shown on return

**Social security number or  
taxpayer identification no.**  
**33-0378778**

**ORANGE COUNTY COMMUNITY FOUNDATION**

Before you check Box A, B, or C below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either will show whether your basis (usually your cost) was reported to the IRS by your broker and may even tell you which box to check.

**Part I Short-Term.** Transactions involving capital assets you held 1 year or less are generally short-term (see instructions). For long-term transactions, see page 2.

**Note:** You may aggregate all short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the totals directly on Schedule D, line 1a; you aren't required to report these transactions on Form 8949 (see instructions).

**You must check Box A, B, or C below. Check only one box.** If more than one box applies for your short-term transactions, complete a separate Form 8949, page 1, for each applicable box. If you have more short-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need.

- (A) Short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see **Note** above)
- (B) Short-term transactions reported on Form(s) 1099-B showing basis **wasn't** reported to the IRS
- (C) Short-term transactions not reported to you on Form 1099-B

1	(a) Description of property (Example: 100 sh. XYZ Co.)	(b) Date acquired (Mo., day, yr.)	(c) Date sold or disposed of (Mo., day, yr.)	(d) Proceeds (sales price)	(e) Cost or other basis. See the <b>Note</b> below and see <i>Column (e)</i> in the instructions	Adjustment, if any, to gain or loss. If you enter an amount in column (g), enter a code in column (f). See instructions.		(h) <b>Gain or (loss).</b> Subtract column (e) from column (d) & combine the result with column (g)
						(f) Code(s)	(g) Amount of adjustment	
	DOVER STREET FEIN 47-5125540	VARIOUS	VARIOUS	1,795.	0.			1,795.
	CENTERGATE CAPITAL PARTNERS FEIN 81-0773	VARIOUS	VARIOUS	0.	9,559.			<9,559.>
<b>2 Totals.</b>	Add the amounts in columns (d), (e), (g), and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, <b>line 1b</b> (if <b>Box A</b> above is checked), <b>line 2</b> (if <b>Box B</b> above is checked), or <b>line 3</b> (if <b>Box C</b> above is checked) ▶			1,795.	9,559.			<7,764.>

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

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

**Social security number or taxpayer identification no.**

**ORANGE COUNTY COMMUNITY FOUNDATION**

**33-0378778**

Before you check Box D, E, or F below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either will show whether your basis (usually your cost) was reported to the IRS by your broker and may even tell you which box to check.

**Part II Long-Term.** Transactions involving capital assets you held more than 1 year are generally long-term (see instructions). For short-term transactions, see page 1.

**Note:** You may aggregate all long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the totals directly on Schedule D, line 8a; you aren't required to report these transactions on Form 8949 (see instructions).

**You must check Box D, E, or F below. Check only one box.** If more than one box applies for your long-term transactions, complete a separate Form 8949, page 2, for each applicable box. If you have more long-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need.

- (D)** Long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see **Note** above)
- (E)** Long-term transactions reported on Form(s) 1099-B showing basis **wasn't** reported to the IRS
- (F)** Long-term transactions not reported to you on Form 1099-B

1	(a) Description of property (Example: 100 sh. XYZ Co.)	(b) Date acquired (Mo., day, yr.)	(c) Date sold or disposed of (Mo., day, yr.)	(d) Proceeds (sales price)	(e) Cost or other basis. See the <b>Note</b> below and see <i>Column (e)</i> in the instructions	Adjustment, if any, to gain or loss. If you enter an amount in column (g), enter a code in column (f). <b>See instructions.</b>		(h) <b>Gain or (loss).</b> Subtract column (e) from column (d) & combine the result with column (g)
						(f) Code(s)	(g) Amount of adjustment	
	DOVER STREET FEIN 47-5125540	VARIOUS	VARIOUS	45,216.	0.			45,216.
<b>2 Totals.</b> Add the amounts in columns (d), (e), (g), and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, <b>line 8b</b> (if <b>Box D</b> above is checked), <b>line 9</b> (if <b>Box E</b> above is checked), or <b>line 10</b> (if <b>Box F</b> above is checked)				45,216.				45,216.

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

**Sales of Business Property**  
 (Also Involuntary Conversions and Recapture Amounts  
 Under Sections 179 and 280F(b)(2))  
 Attach to your tax return.

OMB No. 1545-0184

**2018**  
 Attachment  
 Sequence No. **27**

▶ Go to [www.irs.gov/Form4797](http://www.irs.gov/Form4797) for instructions and the latest information.

**ORANGE COUNTY COMMUNITY FOUNDATION**

Identifying number  
**33-0378778**

1 Enter the gross proceeds from sales or exchanges reported to you for 2018 on Form(s) 1099-B or 1099-S (or substitute statement) that you are including on line 2, 10, or 20 **1**

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

2	(a) Description of property	(b) Date acquired (mo., day, yr.)	(c) Date sold (mo., day, yr.)	(d) Gross sales price	(e) Depreciation allowed or allowable since acquisition	(f) Cost or other basis, plus improvements and expense of sale	(g) Gain or (loss) Subtract (f) from the sum of (d) and (e)
	<b>SEE STATEMENT 7</b>			<b>144,342.</b>		<b>2,155.</b>	<b>142,187.</b>

3	Gain, if any, from Form 4684, line 39	<b>3</b>
4	Section 1231 gain from installment sales from Form 6252, line 26 or 37	<b>4</b>
5	Section 1231 gain or (loss) from like-kind exchanges from Form 8824	<b>5</b>
6	Gain, if any, from line 32, from other than casualty or theft	<b>6</b>
7	Combine lines 2 through 6. Enter the gain or (loss) here and on the appropriate line as follows	<b>7</b> <b>142,187.</b>

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

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

8	Nonrecaptured net section 1231 losses from prior years. See instructions	<b>8</b>
9	Subtract line 8 from line 7. If zero or less, enter -0-. If line 9 is zero, enter the gain from line 7 on line 12 below. If line 9 is more than zero, enter the amount from line 8 on line 12 below and enter the gain from line 9 as a long-term capital gain on the Schedule D filed with your return. See instructions	<b>9</b> <b>142,187.</b>

**Part II Ordinary Gains and Losses** (see instructions)

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


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

LHA For Paperwork Reduction Act Notice, see separate instructions.

Form **4797** (2018)

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

19 (a) Description of section 1245, 1250, 1252, 1254, or 1255 property:		(b) Date acquired (mo., day, yr.)	(c) Date sold (mo., day, yr.)		
A					
B					
C					
D					
These columns relate to the properties on lines 19A through 19D.		Property A	Property B	Property C	Property D
20	Gross sales price (Note: See line 1 before completing.)	20			
21	Cost or other basis plus expense of sale	21			
22	Depreciation (or depletion) allowed or allowable	22			
23	Adjusted basis. Subtract line 22 from line 21	23			
24	Total gain. Subtract line 23 from line 20	24			
<b>25 If section 1245 property:</b>					
a	Depreciation allowed or allowable from line 22	25a			
b	Enter the smaller of line 24 or 25a	25b			
<b>26 If section 1250 property:</b> If straight line depreciation was used, enter -0- on line 26g, except for a corporation subject to section 291.					
a	Additional depreciation after 1975. See instructions	26a			
b	Applicable percentage multiplied by the smaller of line 24 or line 26a. See instructions	26b			
c	Subtract line 26a from line 24. If residential rental property or line 24 isn't more than line 26a, skip lines 26d and 26e	26c			
d	Additional depreciation after 1969 and before 1976	26d			
e	Enter the smaller of line 26c or 26d	26e			
f	Section 291 amount (corporations only)	26f			
g	Add lines 26b, 26e, and 26f	26g			
<b>27 If section 1252 property:</b> Skip this section if you didn't dispose of farmland or if this form is being completed for a partnership.					
a	Soil, water, and land clearing expenses	27a			
b	Line 27a multiplied by applicable percentage	27b			
c	Enter the smaller of line 24 or 27b	27c			
<b>28 If section 1254 property:</b>					
a	Intangible drilling and development costs, expenditures for development of mines and other natural deposits, mining exploration costs, and depletion. See instructions	28a			
b	Enter the smaller of line 24 or 28a	28b			
<b>29 If section 1255 property:</b>					
a	Applicable percentage of payments excluded from income under section 126. See instructions	29a			
b	Enter the smaller of line 24 or 29a. See instructions	29b			

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

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

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

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

FORM 4797

PROPERTY HELD MORE THAN ONE YEAR

STATEMENT 7

DESCRIPTION	DATE ACQUIRED	DATE SOLD	SALES PRICE	DEPR.	COST OR BASIS	GAIN OR LOSS
CAPITAL DYNAMICS REAL ESTATE FEIN 20-574	VARIOUS	VARIOUS	386.			386.
HARVEST MLP INCOME FUND LLC FEIN 27-2968	VARIOUS	VARIOUS	70,186.			70,186.
DOVER STREET FEIN 47-5125540	VARIOUS	VARIOUS	246.			246.
DENHAM OIL & GAS FUND FEIN 33-0378778	VARIOUS	VARIOUS	0.		2,155.	-2,155.
H.I.G. REALTY PARTNERS III (ONSHORE), LP	VARIOUS	VARIOUS	73,524.			73,524.
TOTAL TO 4797, PART I, LINE 2			144,342.		2,155.	142,187.



**Return of U.S. Persons With Respect to Certain Foreign Partnerships**  
▶ Attach to your tax return. ▶ Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.  
Information furnished for the foreign partnership's tax year  
beginning **JAN 1**, 2018, and ending **DEC 31**, 2018

Name of person filing this return  
**ORANGE COUNTY COMMUNITY FOUNDATION**

Filer's identification number  
**33-0378778**

Filer's address (if you aren't filing this form with your tax return)

**A** Category of filer (see Categories of Filers in the instructions and check applicable box(es):  
1  2  3  4

**B** Filer's tax year beginning **JUL 1**, 2018, and ending **JUN 30**, 2019

**C** Filer's share of liabilities: Nonrecourse \$ \_\_\_\_\_ Qualified nonrecourse financing \$ \_\_\_\_\_ Other \$ \_\_\_\_\_

**D** If filer is a member of a consolidated group but not the parent, enter the following information about the parent:

Name \_\_\_\_\_ EIN \_\_\_\_\_  
Address \_\_\_\_\_

**E** Check if any excepted specified foreign financial assets are reported on this form. See instructions

**F** Information about certain other partners (see instructions)

(1) Name	(2) Address	(3) Identification number	(4) Check applicable box(es)		
			Category 1	Category 2	Constructive owner

**G1** Name and address of foreign partnership  
**EMR CAPITAL RF II GOLDEN GROVE LP**  
**LEVEL 7, 151 MACQUARIE ST.**  
**SYDNEY, NSW AUSTRALIA 2000**

**2(a)** EIN (if any)  
**98-1363131**

**2(b)** Reference ID number \_\_\_\_\_

**3** Country under whose laws organized  
**AUSTRALIA**

<b>4</b> Date of organization <b>02/13/2017</b>	<b>5</b> Principal place of business <b>AUSTRALIA</b>	<b>6</b> Principal business activity code number <b>523900</b>	<b>7</b> Principal business activity <b>INVESTMENT</b>	<b>8a</b> Functional currency <b>USD</b>	<b>8b</b> Exchange rate (see instructions)
--	--	---	---	---	--

**H** Provide the following information for the foreign partnership's tax year:

**1** Name, address, and identification number of agent (if any) in the United States \_\_\_\_\_

**2** Check if the foreign partnership must file:  
 Form 1042  Form 8804  Form 1065  
Service Center where Form 1065 is filed: \_\_\_\_\_

**3** Name and address of foreign partnership's agent in country of organization, if any \_\_\_\_\_

**4** Name and address of person(s) with custody of the books and records of the foreign partnership, and the location of such books and records, if different \_\_\_\_\_

**5** During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions  Yes  No  
If "Yes," enter the total amount of the disallowed deductions \$ \_\_\_\_\_

**6** Is the partnership a section 721(c) partnership, as defined in Temporary Regulations section 1.721(c)-1T(b)(14)?  Yes  No

**7** Were any special allocations made by the foreign partnership?  Yes  No

**8** Enter the no. of Forms 8858, Info Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), attached to this return \_\_\_\_\_

**9** How is this partnership classified under the law of the country in which it's organized? **LTD PARTNERSHIP**

**10a** Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Reg. 1.1503(d)-1(b)(4) or part of a combined separate unit under Reg. 1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b  Yes  No

**b** If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Reg. 1.1503(d)-1(b)(5)(ii)?  Yes  No

**11** Does this partnership meet both of the following requirements?  
1. The partnership's total receipts for the tax year were less than \$250,000.  
2. The value of the partnership's total assets at the end of the tax year was less than \$1 million.  
If "Yes," don't complete Schedules L, M-1, and M-2.  Yes  No

Sign Here Only if You're Filing This Form Separately and Not With Your Tax Return.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than general partner or limited liability company member) is based on all information of which preparer has any knowledge.

Signature of general partner or limited liability company member \_\_\_\_\_ Date \_\_\_\_\_

**Print/Type preparer's name** **Preparer's signature** **Date** **Check  if self-employed** **PTIN**

**PATRICIA J. MAYER** \_\_\_\_\_ **P00188643**

**Firm's name** **Firm's EIN** **91-0189318**

**Firm's address** **Phone no.** **858-627-1400**

**MOSS ADAMS LLP** **4747 EXECUTIVE DR SUITE 1300**

**SAN DIEGO, CA 92121**

Schedule A Constructive Ownership of Partnership Interest. Check the boxes that apply to the filer. If you check box b, enter the name, address, and U.S. taxpayer identification number (if any) of the person(s) whose interest you constructively own. See instructions.

a [X] Owns a direct interest b [ ] Owns a constructive interest

Table with 5 columns: Name, Address, Identification number (if any), Check if foreign person, Check if direct partner.

Schedule A-1 Certain Partners of Foreign Partnership (see instructions)

Table with 4 columns: Name, Address, Identification number (if any), Check if foreign person.

Schedule A-2 Foreign Partners of Section 721(c) Partnership (see instructions)

Table with 7 columns: Name of foreign partner, Address, Country of organization (if any), U.S. taxpayer identification number (if any), Check if related to U.S. transferor, Percentage interest (Capital, Profits).

Does the partnership have any other foreign person as a direct partner? [ ] Yes [ ] No

Schedule A-3 Affiliation Schedule. List all partnerships (foreign or domestic) in which the foreign partnership owns a direct interest or indirectly owns a 10% interest.

Table with 5 columns: Name, Address, EIN (if any), Total ordinary income or loss, Check if foreign partnership.

Schedule B Income Statement - Trade or Business Income

Caution: Include only trade or business income and expenses on lines 1a through 22 below. See the instructions for more information.

Main income statement table with 30 rows and 4 columns (Description, 1a, 1b, 1c). Rows include Income (1-8), Deductions (9-21), and Tax and Payment (22-30).

**SCHEDULE O  
(Form 8865)**

(Rev. December 2018)  
Department of the Treasury  
Internal Revenue Service

**Transfer of Property to a Foreign Partnership  
(Under Section 6038B)**

▶ **Attach to Form 8865. See the Instructions for Form 8865.**  
▶ **Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.**

OMB No. 1545-1668

Name of transferor **ORANGE COUNTY COMMUNITY FOUNDATION** Filer's identifying number **33-0378778**

Name of foreign partnership **EMR CAPITAL RF II GOLDEN GROVE LP** EIN (if any) **98-1363131** Reference ID number (see instr)

- 1 a** Is the partnership a section 721(c) partnership (as defined in Temporary Regulations section 1.721(c)-1T(b)(14))? See instructions .....  Yes  No
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property? .....  Yes  No
- 2** Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)? .....  Yes  No

**Part I Transfers Reportable Under Section 6038B**

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) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash							
Stock, notes receivable and payable, and other securities							
Inventory							
Tangible property used in trade or business							
Intangible property described in section 197(f)(9)							
Intangible property, other than intangible property described in section 197(f)(9)							
Other property							
<b>Totals</b>							

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer % (b) After the transfer %

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)? .....  Yes  No

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 8865.

Schedule O (Form 8865) 12-2018

**Return of U.S. Persons With Respect to Certain Foreign Partnerships**  
▶ Attach to your tax return. ▶ Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.  
Information furnished for the foreign partnership's tax year  
beginning **JAN 1**, 2018, and ending **DEC 31**, 2018

Name of person filing this return  
**ORANGE COUNTY COMMUNITY FOUNDATION**

Filer's identification number  
**33-0378778**

Filer's address (if you aren't filing this form with your tax return)

**A** Category of filer (see Categories of Filers in the instructions and check applicable box(es):  
1  2  3  4

**B** Filer's tax year beginning **JUL 1**, 2018, and ending **JUN 30**, 2019

**C** Filer's share of liabilities: Nonrecourse \$ \_\_\_\_\_ Qualified nonrecourse financing \$ \_\_\_\_\_ Other \$ \_\_\_\_\_

**D** If filer is a member of a consolidated group but not the parent, enter the following information about the parent:

Name \_\_\_\_\_ EIN \_\_\_\_\_  
Address \_\_\_\_\_

**E** Check if any excepted specified foreign financial assets are reported on this form. See instructions

**F** Information about certain other partners (see instructions)

(1) Name	(2) Address	(3) Identification number	(4) Check applicable box(es)		
			Category 1	Category 2	Constructive owner

**G1** Name and address of foreign partnership  
**EMR CAPITAL RESOURCES FUND II, LP**  
**89 NEXUS WAY, CAMANA BAY**  
**GRAND CAYMAN, CAYMAN ISLANDS KY1-9007**

**2(a)** EIN (if any)  
**98-1301542**

**2(b)** Reference ID number \_\_\_\_\_

**3** Country under whose laws organized  
**CAYMAN ISLANDS**

<b>4</b> Date of organization <b>02/24/2016</b>	<b>5</b> Principal place of business <b>CAYMAN ISLANDS</b>	<b>6</b> Principal business activity code number <b>523900</b>	<b>7</b> Principal business activity <b>INVESTMENT</b>	<b>8a</b> Functional currency <b>USD</b>	<b>8b</b> Exchange rate (see instructions)
--	---	---	---	---	--

**H** Provide the following information for the foreign partnership's tax year:

**1** Name, address, and identification number of agent (if any) in the United States \_\_\_\_\_

**2** Check if the foreign partnership must file:  
 Form 1042  Form 8804  Form 1065  
Service Center where Form 1065 is filed: \_\_\_\_\_

**3** Name and address of foreign partnership's agent in country of organization, if any \_\_\_\_\_

**4** Name and address of person(s) with custody of the books and records of the foreign partnership, and the location of such books and records, if different \_\_\_\_\_

**5** During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions  Yes  No  
If "Yes," enter the total amount of the disallowed deductions \$ \_\_\_\_\_

**6** Is the partnership a section 721(c) partnership, as defined in Temporary Regulations section 1.721(c)-1T(b)(14)?  Yes  No

**7** Were any special allocations made by the foreign partnership?  Yes  No

**8** Enter the no. of Forms 8858, Info Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), attached to this return \_\_\_\_\_

**9** How is this partnership classified under the law of the country in which it's organized? **LTD PARTNERSHIP**

**10a** Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Reg. 1.1503(d)-1(b)(4) or part of a combined separate unit under Reg. 1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b  Yes  No

**b** If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Reg. 1.1503(d)-1(b)(5)(ii)?  Yes  No

**11** Does this partnership meet both of the following requirements?  
1. The partnership's total receipts for the tax year were less than \$250,000.  
2. The value of the partnership's total assets at the end of the tax year was less than \$1 million.  
If "Yes," don't complete Schedules L, M-1, and M-2.  Yes  No

Sign Here Only if You're Filing This Form Separately and Not With Your Tax Return.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than general partner or limited liability company member) is based on all information of which preparer has any knowledge.

Signature of general partner or limited liability company member \_\_\_\_\_ Date \_\_\_\_\_

**Print/Type preparer's name** **Preparer's signature** **Date** **Check  if self-employed** **PTIN**

**PATRICIA J. MAYER** \_\_\_\_\_ **P00188643**

**Firm's name** **Firm's EIN** **91-0189318**

**Firm's address** **Phone no.** **858-627-1400**

**MOSS ADAMS LLP**  
**4747 EXECUTIVE DR SUITE 1300**  
**SAN DIEGO, CA 92121**

Schedule A Constructive Ownership of Partnership Interest. Check the boxes that apply to the filer. If you check box b, enter the name, address, and U.S. taxpayer identification number (if any) of the person(s) whose interest you constructively own. See instructions.

a [X] Owns a direct interest b [ ] Owns a constructive interest

Table with 5 columns: Name, Address, Identification number (if any), Check if foreign person, Check if direct partner.

Schedule A-1 Certain Partners of Foreign Partnership (see instructions)

Table with 4 columns: Name, Address, Identification number (if any), Check if foreign person.

Schedule A-2 Foreign Partners of Section 721(c) Partnership (see instructions)

Table with 7 columns: Name of foreign partner, Address, Country of organization (if any), U.S. taxpayer identification number (if any), Check if related to U.S. transferor, Percentage interest (Capital, Profits).

Does the partnership have any other foreign person as a direct partner? [ ] Yes [ ] No

Schedule A-3 Affiliation Schedule. List all partnerships (foreign or domestic) in which the foreign partnership owns a direct interest or indirectly owns a 10% interest.

Table with 5 columns: Name, Address, EIN (if any), Total ordinary income or loss, Check if foreign partnership.

Schedule B Income Statement - Trade or Business Income

Caution: Include only trade or business income and expenses on lines 1a through 22 below. See the instructions for more information.

Main income statement table with 30 rows and 4 columns (line number, description, sub-column, total column).

**SCHEDULE O  
(Form 8865)**

(Rev. December 2018)  
Department of the Treasury  
Internal Revenue Service

**Transfer of Property to a Foreign Partnership  
(Under Section 6038B)**

▶ **Attach to Form 8865. See the Instructions for Form 8865.**  
▶ **Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.**

OMB No. 1545-1668

Name of transferor **ORANGE COUNTY COMMUNITY FOUNDATION** Filer's identifying number **33-0378778**

Name of foreign partnership **EMR CAPITAL RESOURCES FUND II, LP** EIN (if any) **98-1301542** Reference ID number (see instr)

- 1 a** Is the partnership a section 721(c) partnership (as defined in Temporary Regulations section 1.721(c)-1T(b)(14))? See instructions .....  Yes  No
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property? .....  Yes  No
- 2** Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)? .....  Yes  No

**Part I Transfers Reportable Under Section 6038B**

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) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash							
Stock, notes receivable and payable, and other securities							
Inventory							
Tangible property used in trade or business							
Intangible property described in section 197(f)(9)							
Intangible property, other than intangible property described in section 197(f)(9)							
Other property							
<b>Totals</b>							

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer % (b) After the transfer %

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)? .....  Yes  No

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 8865.

Schedule O (Form 8865) 12-2018

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

▶ Go to [www.irs.gov/Form926](http://www.irs.gov/Form926) for instructions and the latest information.  
 ▶ Attach to your income tax return for the year of the transfer or distribution.

**Part I U.S. Transferor Information** (see instructions)

Name of transferor <b>ORANGE COUNTY COMMUNITY FOUNDATION</b>	Identifying number (see instructions) <b>33-0378778</b>
---	--

- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  Yes  No
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations?  Yes  No
- b** Did the transferor remain in existence after the transfer?  Yes  No  
 If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

- c** If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  Yes  No  
 If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation	EIN of parent corporation

- d** Have basis adjustments under section 367(a)(4) been made?  Yes  No

- 3** If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
- a** List the name and EIN of the transferor's partnership.

Name of partnership	EIN of partnership

- b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets?  Yes  No
- c** Is the partner disposing of its **entire** interest in the partnership?  Yes  No
- d** Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?  Yes  No

**Part II Transferee Foreign Corporation Information** (see instructions)

<b>4</b> Name of transferee (foreign corporation) <b>HS GROUP</b>	<b>5a</b> Identifying number, if any
--	--------------------------------------

<b>6</b> Address (including country) <b>PO BOX 309 UGLAND HOUSE, GRAND CAYMAN KYI-1104 CAYMAN ISLANDS</b>	<b>5b</b> Reference ID number <b>HS0001</b>
--	--

**7** Country code of country of incorporation or organization  
**CJ**

**8** Foreign law characterization (see instructions)  
**EXEMPTED INVESTMENT COMPANY**

- 9** Is the transferee foreign corporation a controlled foreign corporation?  Yes  No

**Part III Information Regarding Transfer of Property** (see instructions)

**Section A - Cash**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	STMT 8				

**10** Was cash the only property transferred?  Yes  No  
 If "Yes," skip the remainder of Part III and go to Part IV.

**Section B - Other Property (other than intangible property subject to section 367(d))**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					

- 11** Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  Yes  No
- 12 a** Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  Yes  No  
 If "Yes," go to line 12b.
- b** Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation?  Yes  No  
 If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.
- c** Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  Yes  No  
 If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.
- d** Enter the transferred loss amount included in gross income as required under section 91 ► \$ \_\_\_\_\_
- 13** Did the transferor transfer property described in section 367(d)(4)?  Yes  No  
 If "No," skip Section C and questions 14a through 15.

**Section C - Intangible Property Subject to Section 367(d)**

Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						



- 14 a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

**Supplemental Part III Information Required To Be Reported** (see instructions)  
 SEE STATEMENT 9

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

- 16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  
 (a) Before 14.000 % (b) After 16.000 %
- 17 Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  Yes  No  
 If "Yes," complete lines 20b and 20c.  
 b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ \_\_\_\_\_  
 c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

▶ Go to [www.irs.gov/Form926](http://www.irs.gov/Form926) for instructions and the latest information.  
 ▶ Attach to your income tax return for the year of the transfer or distribution.

**Part I U.S. Transferor Information** (see instructions)

Name of transferor <b>ORANGE COUNTY COMMUNITY FOUNDATION</b>	Identifying number (see instructions) <b>33-0378778</b>
---	--

- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  Yes  No
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations?  Yes  No
- b** Did the transferor remain in existence after the transfer?  Yes  No  
 If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

- c** If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  Yes  No  
 If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation	EIN of parent corporation

- d** Have basis adjustments under section 367(a)(4) been made?  Yes  No

- 3** If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
- a** List the name and EIN of the transferor's partnership.

Name of partnership	EIN of partnership

- b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets?  Yes  No
- c** Is the partner disposing of its **entire** interest in the partnership?  Yes  No
- d** Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?  Yes  No

**Part II Transferee Foreign Corporation Information** (see instructions)

<b>4</b> Name of transferee (foreign corporation) <b>ROW DIVERSIFIED OFFSHORE FUND, LTD.</b>	<b>5a</b> Identifying number, if any
---	--------------------------------------

<b>6</b> Address (including country) <b>PO BOX 309 UGLAND HOUSE, GRAND CAYMAN KY1-1104 CAYMAN ISLANDS</b>	<b>5b</b> Reference ID number <b>ROW001</b>
--	--

**7** Country code of country of incorporation or organization  
**CJ**

**8** Foreign law characterization (see instructions)  
**CORPORATION**

- 9** Is the transferee foreign corporation a controlled foreign corporation?  Yes  No

**Part III Information Regarding Transfer of Property** (see instructions)

**Section A - Cash**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	03/01/2019		500,000.		

**10** Was cash the only property transferred?  **Yes**  **No**  
 If "Yes," skip the remainder of Part III and go to Part IV.

**Section B - Other Property (other than intangible property subject to section 367(d))**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					

**11** Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  **Yes**  **No**

**12 a** Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  **Yes**  **No**  
 If "Yes," go to line 12b.

**b** Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation?  **Yes**  **No**  
 If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

**c** Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  **Yes**  **No**  
 If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

**d** Enter the transferred loss amount included in gross income as required under section 91 ► \$ \_\_\_\_\_

**13** Did the transferor transfer property described in section 367(d)(4)?  **Yes**  **No**  
 If "No," skip Section C and questions 14a through 15.

**Section C - Intangible Property Subject to Section 367(d)**

Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						

- 14 a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

**Supplemental Part III Information Required To Be Reported** (see instructions)

SEE STATEMENT 10

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

- 16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  
(a) Before 1.450 % (b) After 1.820 %
- 17 Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  Yes  No  
If "Yes," complete lines 20b and 20c.
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

▶ Go to [www.irs.gov/Form926](http://www.irs.gov/Form926) for instructions and the latest information.  
 ▶ Attach to your income tax return for the year of the transfer or distribution.

**Part I U.S. Transferor Information** (see instructions)

Name of transferor <b>ORANGE COUNTY COMMUNITY FOUNDATION</b>	Identifying number (see instructions) <b>33-0378778</b>
---	--

- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  Yes  No
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations?  Yes  No
- b** Did the transferor remain in existence after the transfer?  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

- c** If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  Yes  No
- If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation	EIN of parent corporation

- d** Have basis adjustments under section 367(a)(4) been made?  Yes  No

- 3** If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
- a** List the name and EIN of the transferor's partnership.

Name of partnership	EIN of partnership

- b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets?  Yes  No
- c** Is the partner disposing of its **entire** interest in the partnership?  Yes  No
- d** Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?  Yes  No

**Part II Transferee Foreign Corporation Information** (see instructions)

<b>4</b> Name of transferee (foreign corporation) <b>TWO SIGMA CHINA CORE EQUITY CAYMAN FUND LTD.</b>	<b>5a</b> Identifying number, if any <b>98-1428994</b>
--	---

<b>6</b> Address (including country) <b>190 ELGIN AVENUE        GEORGE TOWN, GRAND CAYMAN KY1-9005 CAYMAN ISLANDS</b>	<b>5b</b> Reference ID number
--	-------------------------------

**7** Country code of country of incorporation or organization  
**CJ**

**8** Foreign law characterization (see instructions)  
**CORPORATION**

- 9** Is the transferee foreign corporation a controlled foreign corporation?  Yes  No

**Part III Information Regarding Transfer of Property** (see instructions)

**Section A - Cash**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	01/01/2019		4,000,000.		

**10** Was cash the only property transferred?  Yes  No  
 If "Yes," skip the remainder of Part III and go to Part IV.

**Section B - Other Property (other than intangible property subject to section 367(d))**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					

**11** Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  Yes  No

**12 a** Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  Yes  No  
 If "Yes," go to line 12b.

**b** Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation?  Yes  No  
 If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

**c** Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  Yes  No  
 If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

**d** Enter the transferred loss amount included in gross income as required under section 91 ► \$ \_\_\_\_\_

**13** Did the transferor transfer property described in section 367(d)(4)?  Yes  No  
 If "No," skip Section C and questions 14a through 15.

**Section C - Intangible Property Subject to Section 367(d)**

Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						

- 14 a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

**Supplemental Part III Information Required To Be Reported** (see instructions)  
**SEE STATEMENT 11**

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

- 16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  
 (a) Before .000 % (b) After 8.290 %
- 17 Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  Yes  No  
 If "Yes," complete lines 20b and 20c.  
 b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ \_\_\_\_\_  
 c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

▶ Go to [www.irs.gov/Form926](http://www.irs.gov/Form926) for instructions and the latest information.  
 ▶ Attach to your income tax return for the year of the transfer or distribution.

**Part I U.S. Transferor Information** (see instructions)

Name of transferor <b>ORANGE COUNTY COMMUNITY FOUNDATION</b>	Identifying number (see instructions) <b>33-0378778</b>
---	--

- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  Yes  No
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations?  Yes  No
- b** Did the transferor remain in existence after the transfer?  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

- c** If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  Yes  No
- If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation	EIN of parent corporation

- d** Have basis adjustments under section 367(a)(4) been made?  Yes  No

- 3** If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
- a** List the name and EIN of the transferor's partnership.

Name of partnership	EIN of partnership

- b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets?  Yes  No
- c** Is the partner disposing of its **entire** interest in the partnership?  Yes  No
- d** Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?  Yes  No

**Part II Transferee Foreign Corporation Information** (see instructions)

<b>4</b> Name of transferee (foreign corporation) <b>WINDHAM RISK PREMIA (CAYMAN) FUND LTD.</b>	<b>5a</b> Identifying number, if any <b>98-1322351</b>
<b>6</b> Address (including country) <b>UGLAND HOUSE</b> <b>GRAND CAYMAN, KY1-1104 CAYMAN ISLANDS</b>	<b>5b</b> Reference ID number
<b>7</b> Country code of country of incorporation or organization <b>CJ</b>	
<b>8</b> Foreign law characterization (see instructions) <b>CORPORATION</b>	

- 9** Is the transferee foreign corporation a controlled foreign corporation?  Yes  No



**Part III Information Regarding Transfer of Property** (see instructions)

**Section A - Cash**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	04/01/2019		500,000.		

**10** Was cash the only property transferred?  **Yes**  **No**  
 If "Yes," skip the remainder of Part III and go to Part IV.

**Section B - Other Property (other than intangible property subject to section 367(d))**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					

**11** Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  **Yes**  **No**

**12 a** Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  **Yes**  **No**  
 If "Yes," go to line 12b.

**b** Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation?  **Yes**  **No**  
 If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

**c** Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  **Yes**  **No**  
 If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

**d** Enter the transferred loss amount included in gross income as required under section 91 ► \$ \_\_\_\_\_

**13** Did the transferor transfer property described in section 367(d)(4)?  **Yes**  **No**  
 If "No," skip Section C and questions 14a through 15.

**Section C - Intangible Property Subject to Section 367(d)**

Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						

- 14 a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

**Supplemental Part III Information Required To Be Reported** (see instructions)  
**SEE STATEMENT 12**

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

- 16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  
 (a) Before 1.630 % (b) After 2.020 %
- 17 Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  Yes  No  
 If "Yes," complete lines 20b and 20c.  
 b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ \_\_\_\_\_  
 c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

CASH

(A) DATE OF TRANSFER	(C) FAIR MARKET VALUE ON DATE OF TRANSFER
09/01/2018	183,656.
11/01/2018	110,830.
	<u>294,486.</u>

HS GROUP

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION  
4041 MACARTHUR BLVD., SUITE 510  
NEWPORT BEACH, CA 92660  
FEIN: 33-0378778  
TAX YEAR ENDED: JUNE 30, 2019

1. TRANSFEREE FOREIGN CORPORATION

NAME: HS GROUP  
FEIN: N/A

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 09/01/2018  
PROPERTY TRANSFERRED: CASH - \$183,656

DATE: 11/01/2018  
PROPERTY TRANSFERRED: CASH - \$110,830

3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED:  
SEE ABOVE

4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S):  
NOT APPLICABLE

HS GROUP

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION  
4041 MACARTHUR BLVD., SUITE 510  
NEWPORT BEACH, CA 92660  
FEIN: 33-0378778  
TAX YEAR ENDED: JUNE 30, 2019

1. TRANSFEREE FOREIGN CORPORATION

NAME: HS GROUP  
FEIN: N/A

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 09/01/2018  
PROPERTY TRANSFERRED: CASH - \$183,656

DATE: 11/01/2018  
PROPERTY TRANSFERRED: CASH - \$110,830

3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED:  
SEE ABOVE

4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S):  
NOT APPLICABLE

HS GROUP

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION  
FEIN: 33-0378778  
ADDRESS: 4041 MACARTHUR BLVD., SUITE 510  
NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION  
NAME: HS GROUP  
FEIN: N/A  
ADDRESS: PO BOX 309, UGLAND HOUSE  
GRAND CAYMAN, CJ KYI-1104

B) THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE	PROPERTY TRANSFERRED	PROPERTY RECEIVED
09/01/2018	CASH - \$183,656	COMMON STOCK
11/01/2018	CASH - \$110,830	COMMON STOCK

3. CONSIDERATION RECEIVED

SEE ABOVE

HS GROUP

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY:	NOT APPLICABLE
STOCK OR SECURITIES:	NOT APPLICABLE
DEPRECIATED PROPERTY:	NOT APPLICABLE
PROPERTY TO BE LEASED:	NOT APPLICABLE
PROPERTY TO BE SOLD:	NOT APPLICABLE
TRANSFERS TO FSCS:	NOT APPLICABLE
TAINTED PROPERTY:	NOT APPLICABLE
FOREIGN LOSS BRANCH:	NOT APPLICABLE
OTHER INTANGIBLES:	NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

NOT APPLICABLE

ROW DIVERSIFIED OFFSHORE FUND, LTD.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A  
SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION  
4041 MACARTHUR BLVD., SUITE 510  
NEWPORT BEACH, CA 92660  
FEIN: 33-0378778  
TAX YEAR ENDED: JUNE 30, 2019

1. TRANSFEREE FOREIGN CORPORATION  
NAME: ROW DIVERSIFIED OFFSHORE FUND, LTD.  
FEIN: N/A

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:  
  
DATE: 03/01/2019  
PROPERTY TRANSFERRED: CASH - \$500,000

3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED:  
SEE ABOVE

4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S):  
NOT APPLICABLE



ROW DIVERSIFIED OFFSHORE FUND, LTD.

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION  
FEIN: 33-0378778  
ADDRESS: 4041 MACARTHUR BLVD., SUITE 510  
NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION  
NAME: ROW DIVERSIFIED OFFSHORE FUND, LTD.  
FEIN: N/A  
ADDRESS: PO BOX 309, UGLAND HOUSE  
GRAND CAYMAN, CJ KYI-1104

B) THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE	PROPERTY TRANSFERRED	PROPERTY RECEIVED
03/01/2019	CASH - \$500,000	COMMON STOCK

3. CONSIDERATION RECEIVED

SEE ABOVE

ROW DIVERSIFIED OFFSHORE FUND, LTD.

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY:	NOT APPLICABLE
STOCK OR SECURITIES:	NOT APPLICABLE
DEPRECIATED PROPERTY:	NOT APPLICABLE
PROPERTY TO BE LEASED:	NOT APPLICABLE
PROPERTY TO BE SOLD:	NOT APPLICABLE
TRANSFERS TO FSCS:	NOT APPLICABLE
TAINED PROPERTY:	NOT APPLICABLE
FOREIGN LOSS BRANCH:	NOT APPLICABLE
OTHER INTANGIBLES:	NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

NOT APPLICABLE

TWO SIGMA CHINA CORE EQUITY CAYMAN FUND LTD.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A  
SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION  
4041 MACARTHUR BLVD., SUITE 510  
NEWPORT BEACH, CA 92660  
FEIN: 33-0378778  
TAX YEAR ENDED: JUNE 30, 2019

1. TRANSFEREE FOREIGN CORPORATION

NAME: TWO SIGMA CHINA CORE EQUITY CAYMAN FUND LTD.  
FEIN: 98-1428994

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 01/01/2019  
PROPERTY TRANSFERRED: CASH - \$4,000,000

3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED:  
SEE ABOVE

4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S):  
NOT APPLICABLE

TWO SIGMA CHINA CORE EQUITY CAYMAN FUND LTD.

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION  
FEIN: 33-0378778  
ADDRESS: 4041 MACARTHUR BLVD., SUITE 510  
NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION  
NAME: TWO SIGMA CHINA CORE EQUITY CAYMAN FUND LTD.  
FEIN: 98-1428994  
ADDRESS: 190 ELGIN AVENUE, GEORGE TOWN  
GRAND CAYMAN, CJ KY1-9005

B) THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE	PROPERTY TRANSFERRED	PROPERTY RECEIVED
01/01/2019	CASH - \$4,000,000	COMMON STOCK

3. CONSIDERATION RECEIVED

SEE ABOVE

TWO SIGMA CHINA CORE EQUITY CAYMAN FUND LTD.

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY:	NOT APPLICABLE
STOCK OR SECURITIES:	NOT APPLICABLE
DEPRECIATED PROPERTY:	NOT APPLICABLE
PROPERTY TO BE LEASED:	NOT APPLICABLE
PROPERTY TO BE SOLD:	NOT APPLICABLE
TRANSFERS TO FSCS:	NOT APPLICABLE
TAINTED PROPERTY:	NOT APPLICABLE
FOREIGN LOSS BRANCH:	NOT APPLICABLE
OTHER INTANGIBLES:	NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

NOT APPLICABLE

WINDHAM RISK PREMIA (CAYMAN) FUND LTD.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION  
4041 MACARTHUR BLVD., SUITE 510  
NEWPORT BEACH, CA 92660  
FEIN: 33-0378778  
TAX YEAR ENDED: JUNE 30, 2019

1. TRANSFEREE FOREIGN CORPORATION  
NAME: WINDHAM RISK PREMIA (CAYMAN) FUND LTD.  
FEIN: 98-1322351

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:  
DATE: 04/01/2019  
PROPERTY TRANSFERRED: CASH - \$500,000

3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED:  
SEE ABOVE

4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S):  
NOT APPLICABLE

WINDHAM RISK PREMIA (CAYMAN) FUND LTD.

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION  
FEIN: 33-0378778  
ADDRESS: 4041 MACARTHUR BLVD., SUITE 510  
NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION  
NAME: WINDHAM RISK PREMIA (CAYMAN) FUND LTD  
FEIN: 98-1322351  
ADDRESS: UGLAND HOUSE  
GRAND CAYMAN, CJ KY1-1104

B) THE ROMAN CATHOLIC BISHOP OF ORANGE TRANSFERRED THE FOLLOWING PROPERTY:

DATE	PROPERTY TRANSFERRED	PROPERTY RECEIVED
04/01/2019	CASH - \$500,000	COMMON STOCK

3. CONSIDERATION RECEIVED

SEE ABOVE

WINDHAM RISK PREMIA (CAYMAN) FUND LTD.

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY:	NOT APPLICABLE
STOCK OR SECURITIES:	NOT APPLICABLE
DEPRECIATED PROPERTY:	NOT APPLICABLE
PROPERTY TO BE LEASED:	NOT APPLICABLE
PROPERTY TO BE SOLD:	NOT APPLICABLE
TRANSFERS TO FSCS:	NOT APPLICABLE
TAINTED PROPERTY:	NOT APPLICABLE
FOREIGN LOSS BRANCH:	NOT APPLICABLE
OTHER INTANGIBLES:	NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

NOT APPLICABLE