

Exempt Organization Business Income Tax Return  
(and proxy tax under section 6033(e))Department of the Treasury  
Internal Revenue Service

For calendar year 2022 or other tax year beginning \_\_\_\_\_, and ending \_\_\_\_\_.

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).

2022

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

A <input type="checkbox"/> Check box if address changed.	Name of organization ( <input type="checkbox"/> Check box if name changed and see instructions.)	D Employer identification number
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) <input type="checkbox"/> 529A	GREATER MILWAUKEE FOUNDATION, INC. Number, street, and room or suite no. If a P.O. box, see instructions. 101 W. PLEASANT, 210 City or town, state or province, country, and ZIP or foreign postal code MILWAUKEE, WI 53212	E Group exemption number (see instructions)
C Book value of all assets at end of year .....	894,352,035.	F <input type="checkbox"/> Check box if an amended return.
G 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	State college/university	
H Check if filing only to <input type="checkbox"/> Claim credit from Form 8941 <input type="checkbox"/> Claim a refund shown on Form 2439		
I Check if a 501(c)(3) organization filing a consolidated return with a 501(c)(2) titleholding corporation .....	<input type="checkbox"/>	
J Enter the number of attached Schedules A (Form 990-T) .....	1	
K During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group? If "Yes," enter the name and identifying number of the parent corporation.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
L The books are in care of GREATER MILWAUKEE FOUNDATION	Telephone number	414-272-5805

**Part I Total Unrelated Business Taxable Income**

1 Total of unrelated business taxable income computed from all unrelated trades or businesses (see instructions) .....	1	0.
2 Reserved .....	2	
3 Add lines 1 and 2 .....	3	
4 Charitable contributions (see instructions for limitation rules) .....	4	0.
5 Total unrelated business taxable income before net operating losses. Subtract line 4 from line 3 .....	5	
6 Deduction for net operating loss. See instructions .....	6	
7 Total of unrelated business taxable income before specific deduction and section 199A deduction. Subtract line 6 from line 5 .....	7	
8 Specific deduction (generally \$1,000, but see instructions for exceptions) .....	8	1,000.
9 <b>Trusts.</b> Section 199A deduction. See instructions .....	9	
10 <b>Total deductions.</b> Add lines 8 and 9 .....	10	1,000.
11 <b>Unrelated business taxable income.</b> Subtract line 10 from line 7. If line 10 is greater than line 7, enter zero .....	11	0.

**Part II Tax Computation**

1 <b>Organizations taxable as corporations.</b> Multiply Part I, line 11 by 21% (0.21) .....	1	0.
2 <b>Trusts taxable at trust rates.</b> See instructions for tax computation. Income tax on the amount on Part I, line 11 from: <input type="checkbox"/> Tax rate schedule or <input type="checkbox"/> Schedule D (Form 1041) .....	2	
3 <b>Proxy tax.</b> See instructions .....	3	
4 Other tax amounts. See instructions .....	4	
5 Alternative minimum tax (trusts only) .....	5	
6 <b>Tax on noncompliant facility income.</b> See instructions .....	6	
7 <b>Total.</b> Add lines 3 through 6 to line 1 or 2, whichever applies .....	7	0.

LHA For Paperwork Reduction Act Notice, see instructions.

Form 990-T (2022)

## **Application for Automatic Extension of Time To File an Exempt Organization Return**

Department of the Treasury  
Internal Revenue Service

- File a separate application for each return.
- Go to [www.irs.gov/Form8868](http://www.irs.gov/Form8868) for the latest information.

**Electronic filing (e-file).** You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit [www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits](http://www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits).

**Automatic 6-Month Extension of Time.** Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

<b>Type or print</b>  File by the due date for filing your return. See instructions.	Name of exempt organization or other filer, see instructions.  <b>GREATER MILWAUKEE FOUNDATION, INC.</b>	Taxpayer identification number (TIN)  <b>39-6036407</b>
	Number, street, and room or suite no. If a P.O. box, see instructions.  <b>101 W. PLEASANT, 210</b>	
	City, town or post office, state, and ZIP code. For a foreign address, see instructions.  <b>MILWAUKEE WI 53212</b>	

Enter the Return Code for the return that this application is for (file a separate application for each return)

Application Is For	Return Code	Application Is For	Return Code
Form 990 or Form 990-EZ	01	Form 1041-A	08
Form 4720 (individual)	03	Form 4720 (other than individual)	09
Form 990-PF	04	Form 5227	10
Form 990-T (sec. 401(a) or 408(a) trust)	05	Form 6069	11
Form 990-T (trust other than above)	06	Form 8870	12
Form 990-T (corporation)	07		

GREATER MILWAUKEE FOUNDATION

- The books are in the care of ► 101 W.PLEASANT, STE.210 - MILWAUKEE, WI 53212

Telephone No. ► 414-272-5805

Fax No. ►

- If the organization does not have an office or place of business in the United States, check this box ►
- If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) \_\_\_\_\_. If this is for the whole group, check this box ►  . If it is for part of the group, check this box ►  and attach a list with the names and TINs of all members the extension is for.

1 I request an automatic 6-month extension of time until NOVEMBER 15, 2023, to file the exempt organization return for the organization named above. The extension is for the organization's return for:

►  calendar year 2022 or

►  tax year beginning \_\_\_\_\_ and ending \_\_\_\_\_

2 If the tax year entered in line 1 is for less than 12 months, check reason:  Initial return  Final return  
 Change in accounting period

**3a** If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions. **3a** **\$**

<u>estimated tax payments made. Include any prior year overpayment allowed as a credit.</u>	<b>3b</b>	\$	0.
<b>c Balance due.</b> Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions.	<b>3c</b>	\$	0.

**Caution:** If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.

**LHA For Privacy Act and Paperwork Reduction Act Notice, see instructions.**

**Form 8868 (Rev. 1-2022)**

**Part III Tax and Payments**

1a	Foreign tax credit (corporations attach Form 1118; trusts attach Form 1116) .....	1a		
b	Other credits (see instructions) .....	1b		
c	General business credit. Attach Form 3800 (see instructions) .....	1c		
d	Credit for prior year minimum tax (attach Form 8801 or 8827) .....	1d		
e	<b>Total credits.</b> Add lines 1a through 1d .....	1e		
2	Subtract line 1e from Part II, line 7 .....	2	0.	
3	Other amounts due. 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 statement) .....	3		
4	<b>Total tax.</b> Add lines 2 and 3 (see instructions). <input type="checkbox"/> Check if includes tax previously deferred under section 1294. Enter tax amount here .....	4	0.	
5	Current net 965 tax liability paid from Form 965-A, Part II, column (k) .....	5	0.	
6a	Payments: A 2021 overpayment credited to 2022 .....	6a		
b	2022 estimated tax payments. Check if section 643(g) election applies .....	6b		
c	Tax deposited with Form 8868 .....	6c		
d	Foreign organizations: Tax paid or withheld at source (see instructions) .....	6d		
e	Backup withholding (see instructions) .....	6e		
f	Credit for small employer health insurance premiums (attach Form 8941) .....	6f		
g	Other credits, adjustments, and payments: <input type="checkbox"/> Form 2439 <input type="checkbox"/> Form 4136 <input type="checkbox"/> Other _____ Total _____	6g		
7	<b>Total payments.</b> Add lines 6a through 6g .....	7		
8	Estimated tax penalty (see instructions). Check if Form 2220 is attached .....	8		
9	<b>Tax due.</b> If line 7 is smaller than the total of lines 4, 5, and 8, enter amount owed .....	9		
10	<b>Overpayment.</b> If line 7 is larger than the total of lines 4, 5, and 8, enter amount overpaid .....	10		
11	Enter the amount of line 10 you want: <b>Credited to 2023 estimated tax</b> <span style="float: right;">Refunded</span>	11		

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

1	At any time during the 2022 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 .....	Yes	No
2	During the tax year, did the organization receive a distribution from, or was it the grantor of, or transferor to, a foreign trust? .....	X	
3	Enter the amount of tax-exempt interest received or accrued during the tax year .....	\$	
4	Enter available pre-2018 NOL carryovers here \$ .....	Do not include any post-2017 NOL carryover shown on Schedule A (Form 990-T). Don't reduce the NOL carryover shown here by any deduction reported on Part I, line 6.	
5	Post-2017 NOL carryovers. Enter the Business Activity Code and available post-2017 NOL carryovers. Don't reduce the amounts shown below by any NOL claimed on any Schedule A, Part II, line 17 for the tax year. See instructions.		
	Business Activity Code	Available post-2017 NOL carryover	
	523000	\$	963,578.
		\$	
6a	Did the organization change its method of accounting? (see instructions) .....	X	
b	If 6a is "Yes," has the organization described the change on Form 990, 990-EZ, 990-PF, or Form 1128? If "No," explain in Part V .....		

**Part V Supplemental Information**

Provide the explanation required by Part IV, line 6b. Also, provide any other additional information. See instructions.

<b>Sign Here</b>	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.			May the IRS discuss this return with the preparer shown below (see instructions)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Signature of officer	Date	Title	SECRETARY	
<b>Paid Preparer Use Only</b>	Print/Type preparer's name MONROE J GIERL	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN P01413237
	Firm's name KPMG LLP			Firm's EIN	13-5565207
	90 S. 7TH ST., STE 4200				
	Firm's address MINNEAPOLIS, MN 55402			Phone no. 612-305-5000	

**SCHEDULE A**  
(Form 990-T)Department of the Treasury  
Internal Revenue Service**Unrelated Business Taxable Income  
From an Unrelated Trade or Business**

OMB No. 1545-0047

**2022**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).Open to Public Inspection for  
501(c)(3) Organizations Only

<b>A</b> Name of the organization GREATER MILWAUKEE FOUNDATION, INC.	<b>B</b> Employer identification number 39-6036407
<b>C</b> Unrelated business activity code (see instructions) 523000	<b>D</b> Sequence: 1 of 1

**E** Describe the unrelated trade or business **PASS-THROUGH INVESTMENTS**

<b>Part I</b> <b>Unrelated Trade or Business Income</b>		<b>(A) Income</b>	<b>(B) Expenses</b>	<b>(C) Net</b>
<b>1a</b> Gross receipts or sales				
<b>b</b> Less returns and allowances	<b>c</b> Balance			
<b>2</b> Cost of goods sold (Part III, line 8)				
<b>3</b> Gross profit. Subtract line 2 from line 1c				
<b>4a</b> Capital gain net income (attach Schedule D (Form 1041 or Form 1120)). See instructions				
<b>b</b> Net gain (loss) (Form 4797) (attach Form 4797). See instructions				
<b>c</b> Capital loss deduction for trusts				
<b>5</b> Income (loss) from a partnership or an S corporation (attach statement) <b>STATEMENT 1</b>				
<b>6</b> Rent income (Part IV)				
<b>7</b> Unrelated debt-financed income (Part V)				
<b>8</b> Interest, annuities, royalties, and rents from a controlled organization (Part VI)				
<b>9</b> Investment income of section 501(c)(7), (9), or (17) organizations (Part VII)				
<b>10</b> Exploited exempt activity income (Part VIII)				
<b>11</b> Advertising income (Part IX)				
<b>12</b> Other income (see instructions; attach statement)				
<b>13 Total.</b> Combine lines 3 through 12		<b>-417,870.</b>		<b>-417,870.</b>

**Part II** **Deductions Not Taken Elsewhere** See instructions for limitations on deductions. Deductions must be directly connected with the unrelated business income

<b>1</b> Compensation of officers, directors, and trustees (Part X)	<b>1</b>
<b>2</b> Salaries and wages	<b>2</b>
<b>3</b> Repairs and maintenance	<b>3</b>
<b>4</b> Bad debts	<b>4</b>
<b>5</b> Interest (attach statement). See instructions	<b>5</b>
<b>6</b> Taxes and licenses	<b>6</b>
<b>7</b> Depreciation (attach Form 4562). See instructions	<b>7</b>
<b>8</b> Less depreciation claimed in Part III and elsewhere on return	<b>8a</b>
<b>9</b> Depletion	<b>9</b>
<b>10</b> Contributions to deferred compensation plans	<b>10</b>
<b>11</b> Employee benefit programs	<b>11</b>
<b>12</b> Excess exempt expenses (Part VIII)	<b>12</b>
<b>13</b> Excess readership costs (Part IX)	<b>13</b>
<b>14</b> Other deductions (attach statement)	<b>14</b>
<b>15 Total deductions.</b> Add lines 1 through 14	<b>15</b> 0.
<b>16</b> Unrelated business income before net operating loss deduction. Subtract line 15 from Part I, line 13, column (C)	<b>16</b> -417,870.
<b>17</b> Deduction for net operating loss. See instructions	<b>17</b> 0.
<b>18 Unrelated business taxable income.</b> Subtract line 17 from line 16	<b>18</b> -417,870.

LHA For Paperwork Reduction Act Notice, see instructions.

Schedule A (Form 990-T) 2022

**Part III Cost of Goods Sold**

Enter method of inventory valuation

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

**Part IV Rent Income (From Real Property and Personal Property Leased with Real Property)**

1 Description of property (property street address, city, state, ZIP code). Check if a dual-use. See instructions.

A  \_\_\_\_\_  
 B  \_\_\_\_\_  
 C  \_\_\_\_\_  
 D  \_\_\_\_\_

	A	B	C	D
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) .....				
c Total rents received or accrued by property. Add lines 2a and 2b, columns A through D .....				
3 Total rents received or accrued. Add line 2c columns A through D. Enter here and on Part I, line 6, column (A) .....				0.
Deductions directly connected with the income				
4 in lines 2(a) and 2(b) (attach statement) .....				
5 Total deductions. Add line 4 columns A through D. Enter here and on Part I, line 6, column (B) .....				0.

**Part V Unrelated Debt-Financed Income** (see instructions)

1 Description of debt-financed property (street address, city, state, ZIP code). Check if a dual-use. See instructions.

A  \_\_\_\_\_  
 B  \_\_\_\_\_  
 C  \_\_\_\_\_  
 D  \_\_\_\_\_

	A	B	C	D
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 statement) .....				
b Other deductions (attach statement) .....				
c Total deductions (add lines 3a and 3b, columns A through D) .....				
4 Amount of average acquisition debt on or allocable to debt-financed property (attach statement) .....				
5 Average adjusted basis of or allocable to debt-financed property (attach statement) .....				
6 Divide line 4 by line 5 .....	%	%	%	%
7 Gross income reportable. Multiply line 2 by line 6 .....				
8 Total gross income (add line 7, columns A through D). Enter here and on Part I, line 7, column (A) .....				0.
9 Allocable deductions. Multiply line 3c by line 6 .....				
10 Total allocable deductions. Add line 9, columns A through D. Enter here and on Part I, line 7, column (B) .....				0.
11 Total dividends-received deductions included in line 10 .....				0.

**Part VI Interest, Annuities, and Rents from Controlled Organizations** (see instructions)

		Exempt Controlled Organizations			
1. Name of controlled organization	2. Employer identification number	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 Part I, line 8, column (A)	Add columns 6 and 11. Enter here and on Part I, line 8, column (B)
<b>Totals</b>			0.	0.	

**Part VII 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 statement)	4. Set-asides (attach statement)	5. Total deductions and set-asides (add cols 3 and 4)
(1)				
(2)				
(3)				
(4)				
		Add amounts in column 2. Enter here and on Part I, line 9, column (A)		Add amounts in column 5. Enter here and on Part I, line 9, column (B)
<b>Totals</b>		0.		0.

**Part VIII Exploited Exempt Activity Income, Other Than Advertising Income** (see instructions)

1 Description of exploited activity: _____	2
2 Gross unrelated business income from trade or business. Enter here and on Part I, line 10, column (A) .....	3
3 Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (B) .....	4
4 Net income (loss) from unrelated trade or business. Subtract line 3 from line 2. If a gain, complete lines 5 through 7 .....	5
5 Gross income from activity that is not unrelated business income .....	6
6 Expenses attributable to income entered on line 5 .....	7
7 Excess exempt expenses. Subtract line 5 from line 6, but do not enter more than the amount on line 4. Enter here and on Part II, line 12 .....	



## FORM 990-T (A)

## INCOME (LOSS) FROM PARTNERSHIPS

## STATEMENT 1

DESCRIPTION	NET INCOME OR (LOSS)
- ORDINARY BUSINESS INCOME (LOSS)	-417,870.
TOTAL INCLUDED ON SCHEDULE A, PART I, LINE 5	-417,870.
	<hr/>

## 990-T SCH A

## POST-2017 NET OPERATING LOSS DEDUCTION

## STATEMENT 2

TAX YEAR	LOSS SUSTAINED	LOSS PREVIOUSLY APPLIED	LOSS REMAINING	AVAILABLE THIS YEAR
12/31/20	287,969.	0.	287,969.	287,969.
12/31/21	675,609.	0.	675,609.	675,609.
NOL CARRYOVER AVAILABLE THIS YEAR			963,578.	963,578.
			<hr/>	<hr/>

Form **8865**Department of the Treasury  
Internal Revenue Service**Return of U.S. Persons With Respect to  
Certain Foreign Partnerships**

OMB No. 1545-1668

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**, 2022, and ending **DEC 31**

, 2022

**2022**Attachment  
Sequence No. **865**

Name of person filing this return

Filer's identification number

39-6036407

**GREATER MILWAUKEE FOUNDATION, INC.**

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 **JAN 1**, 2022, and ending **DEC 31**, 2022**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

ALTAS PARTNERS HOLDINGS II (A) LP

**2(a)** EIN (if any)

98-1462148

79 WELLINGTON STREET WEST, SUITE 3500

TORONTO, CANADA M5K 1K7

**2(b)** Reference ID number

N/A

**4** Date of organization**5** Principal place of business**6** Principal business activity code number**7** Principal business activity**8a** Functional currency**8b** 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 StatesN/A **2** Check if the foreign partnership must file:  Form 1042  Form 8804  Form 1065

Service Center where Form 1065 is filed:

E-FILE

**3** Name and address of foreign partnership's agent in country of organization, if anyN/A **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

N/A

**5** During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is notallowed under section 267A? See instructions  Yes  NoIf "Yes," enter the total amount of the disallowed deductions  \$**6** Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)?  Yes  No**7** Were any special allocations made by the foreign partnership?  Yes  No**8** Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), attached to this return. See instructions**9** How is this partnership classified under the law of the country in which it's organized? **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 Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section 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 Regulations section 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

LHA For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

Form **8865** (2022)

**12 a** Is the filer of this Form 8865 claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transaction with the foreign partnership? If "Yes," complete lines 12b, 12c, and 12d. See instructions .....  Yes  No

**b** Enter the amount of gross receipts derived from all sales of general property to the foreign partnership that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) .....

**c** Enter the amount of gross receipts derived from all sales of intangible property to the foreign partnership that the filer included in its computation of FDDEI .....

**d** Enter the amount of gross receipts derived from all services provided to the foreign partnership that the filer included in its computation of FDDEI .....

**13** Enter the number of foreign partners subject to section 864(c)(8) as a result of transferring all or a portion of an interest in the partnership or of receiving a distribution from the partnership .....

**14** At any time during the tax year were any transfers between the partnership and its partners subject to the disclosure requirements of Regulations section 1.707-8? .....

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				
Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed
	Firm's name	Firm's EIN	PTIN	
	Firm's address	Phone no.		

**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**  Owns a direct interest      **b**  Owns a constructive interest

Name	Address	Identification number (if any)	Check if foreign person	Check if direct partner

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

Name	Address	Identification number (if any)	Check if foreign person

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

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
					<input type="checkbox"/>	% %
					<input type="checkbox"/>	% %
					<input type="checkbox"/>	% %

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.

Name	Address	EIN (if any)	Total ordinary income or loss	Check if foreign partner- ship

## **SCHEDULE O (Form 8865)**

(Rev. October 2021)  
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

GREATER MILWAUKEE FOUNDATION INC

**Filer's identifying number**

39-6036407

Name of foreign partnership ALTAS PARTNERS HOLDINGS TT (A) LTD

EIN (if any)  
98-1462148

N/A

1a Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1(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	12/31/22		207,765.				
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							
Totals			207,765.				

3 Enter the transferor's percentage interest in the partnership: (a) Before the transfer .3167 % (b) After the transfer .3167 %

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

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

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

Schedule Q (Form 8865) 10-2021

Form **8865****Return of U.S. Persons With Respect to  
Certain Foreign Partnerships**

OMB No. 1545-1668

Department of the Treasury  
Internal Revenue ServiceAttach to your tax return.  
Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.

2022

Attachment  
Sequence No. **865**Information furnished for the foreign partnership's tax year  
beginning **JAN 1**, 2022, and ending **DEC 31**, 2022

Name of person filing this return

Filer's identification number

39-6036407

**GREATER MILWAUKEE FOUNDATION, INC.**

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 **JAN 1**, 2022, and ending **DEC 31**, 2022**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

DIGITAL ALPHA II-A LP

2(a) EIN (if any)

98-1532247

3535 EXECUTIVE TERMINAL DR., STE 110

HENDERSON, NV 89052

2(b) Reference ID number

N/A

<b>4</b> Date of organization 02/13/2020	<b>5</b> Principal place of business CAYMAN ISLANDS	<b>6</b> Principal business activity code number 523900	<b>7</b> Principal business activity INVESTING	<b>8a</b> Functional currency USD	<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

N/A

2 Check if the foreign partnership must file:

 Form 1042  Form 8804  Form 1065

Service Center where Form 1065 is filed:

E-FILE

3 Name and address of foreign partnership's agent in country of organization, if any  
MAPLES CORPORATE SERVICES LIMITED

PO BOX 309

UGLAND HOUSE, GRAND CAYMAN CAYMAN ISL

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

N/A

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 Regulations section 1.721(c)-1(b)(14)?

 Yes  No

7 Were any special allocations made by the foreign partnership?

 Yes  No8 Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities  
(FDEs) and Foreign Branches (FBs), attached to this return. See instructions

0

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

EXEMPTED LTD PSHIP

10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a

separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section  
1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b Yes  Nob If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations  
section 1.1503(d)-1(b)(5)(ii)? Yes  No11 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

LHA For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

Form **8865** (2022)

**12 a** Is the filer of this Form 8865 claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transaction with the foreign partnership? If "Yes," complete lines 12b, 12c, and 12d. See instructions .....  Yes  No

**b** Enter the amount of gross receipts derived from all sales of general property to the foreign partnership that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) .....

**c** Enter the amount of gross receipts derived from all sales of intangible property to the foreign partnership that the filer included in its computation of FDDEI .....

**d** Enter the amount of gross receipts derived from all services provided to the foreign partnership that the filer included in its computation of FDDEI .....

**13** Enter the number of foreign partners subject to section 864(c)(8) as a result of transferring all or a portion of an interest in the partnership or of receiving a distribution from the partnership .....

**14** At any time during the tax year were any transfers between the partnership and its partners subject to the disclosure requirements of Regulations section 1.707-8? .....

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				
<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed
	Firm's name	Firm's EIN	PTIN	
	Firm's address	Phone no.		

**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.

<b>a</b> <input type="checkbox"/> Owns a direct interest	<b>b</b> <input type="checkbox"/> Owns a constructive interest

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

Name	Address	Identification number (if any)	Check if foreign person	Check if direct partner

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

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
				<input type="checkbox"/>	%	%
				<input type="checkbox"/>	%	%

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.

STMT 3	Name	Address	EIN (if any)	Total ordinary income or loss	Check if foreign partnership

## **SCHEDULE O (Form 8865)**

(Rev. October 2021)  
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

GREATER MILWAUKEE FOUNDATION INC

**Filer's identifying number**

39-6036407

Name of foreign partnership

**EIN (if any)**

N/A

**1a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1(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	12/31/22		977,331.				
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							
Totals			977,331.				

3 Enter the transferor's percentage interest in the partnership: (a) Before the transfer .5665 % (b) After the transfer .5630 %

---

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

\_\_\_\_\_

\_\_\_\_\_

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

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  X  No

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

Schedule O (Form 8865) 10-2021

FORM 8865

AFFILIATION SCHEDULE

STATEMENT 3

NAME	ADDRESS	IDENTIFYING NUMBER	TOTAL ORDINARY INCOME OR (LOSS)	IF FOR- EIGN P'SH
DA EDGE SOLUTIONS LP	3535 EXECUTIVE TERMINAL DR HENDERSON, NV 89502	98-1550809		X
DA 5G SOL. EQUITY SPV LP	3535 EXECUTIVE TERMINAL DR HENDERSON, NV 89502	86-1688180		
DA 5G SOL. OUT. BASED FIN.	3535 EXECUTIVE TERMINAL DR HENDERSON, NV 89502	86-1717284		
DA 5G SOL. SPLITTER LP	3535 EXECUTIVE TERMINAL DR HENDERSON, NV 89502	86-1669517		
THEA TOPCO LP	3535 EXECUTIVE TERMINAL DR HENDERSON, NV 89502	87-3847403		

Form 8865

## Return of U.S. Persons With Respect to Certain Foreign Partnerships

OMB No. 1545-1668

2022

Attachment Sequence No. 865

Department of the Treasury  
Internal Revenue Service

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 , 2022, and ending DEC 31

, 2022

Name of person filing this return

Filer's identification number

39-6036407

GREATER MILWAUKEE FOUNDATION, INC.

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 JAN 1 , 2022, and ending DEC 31 , 2022

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

LAKESTAR III LP

2(a) EIN (if any)

98-1473139

EAST WING, TRAFALGAR COURT

LES BANQUES, ST. PETER PORT GUERNSEY GY1 3PP

2(b) Reference ID number

N/A

4 Date of organization 08/03/2017

5 Principal place of business GUERNSEY

6 Principal business activity code number 523900

7 Principal business activity INVESTMENT

8a Functional currency EUR

8b 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  
N/A

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  
LAKESTAR III (G.P.) LIMITED

4 Name and address of person(s) with custody of the books and records of the foreign

EAST WING, TRAFALGAR COURT

LES BANQUES, ST. PETER PORT GUERNSEY

partnership, and the location of such books and records, if different

AZTEC FINANCIAL SERVICES (GUERNSEY)

EAST WING, TRAFALGAR COURT

LES BANQUES, ST. PETER PORT GUERNSEY

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 Regulations section 1.721(c)-1(b)(14)?  Yes  No

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

8 Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), attached to this return. See instructions 0

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

10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section 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 Regulations section 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

LHA For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

Form 8865 (2022)

**12 a** Is the filer of this Form 8865 claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transaction with the foreign partnership? If "Yes," complete lines 12b, 12c, and 12d. See instructions .....  Yes  No

**b** Enter the amount of gross receipts derived from all sales of general property to the foreign partnership that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) .....

**c** Enter the amount of gross receipts derived from all sales of intangible property to the foreign partnership that the filer included in its computation of FDDEI .....

**d** Enter the amount of gross receipts derived from all services provided to the foreign partnership that the filer included in its computation of FDDEI .....

**13** Enter the number of foreign partners subject to section 864(c)(8) as a result of transferring all or a portion of an interest in the partnership or of receiving a distribution from the partnership .....

**14** At any time during the tax year were any transfers between the partnership and its partners subject to the disclosure requirements of Regulations section 1.707-8? .....  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 _____				
<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed
	Firm's name	PTIN _____		
	Firm's address _____	Firm's EIN _____ Phone no. _____		

**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**  Owns a direct interest      **b**  Owns a constructive interest

Name	Address	Identification number (if any)	Check if foreign person	Check if direct partner

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

Name	Address	Identification number (if any)	Check if foreign person

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

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.

Name	Address	EIN (if any)	Total ordinary income or loss	Check if foreign partnership

**SCHEDULE O**  
**(Form 8865)**(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service**Transfer of Property to a Foreign Partnership**  
**(Under Section 6038B)**

OMB No. 1545-1668

► 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.

Name of transferor

GREATER MILWAUKEE FOUNDATION, INC.

Filer's identifying number

39-6036407

Name of foreign partnership LAKESTAR III LP

EIN (if any)  
98-1473139

N/A

1 a Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1(b)(14))? See instructions  Yes  X  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  X  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	12/31/22		220,124.				
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							
Totals			220,124.				

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):

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**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  X  No

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

Schedule O (Form 8865) 10-2021

Form **8865****Return of U.S. Persons With Respect to  
Certain Foreign Partnerships**

OMB No. 1545-1668

Department of the Treasury  
Internal Revenue ServiceAttach 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 , 2022, and ending DEC 31

, 2022

**2022**Attachment  
Sequence No. **865**

Name of person filing this return

Filer's identification number

39-6036407

GREATER MILWAUKEE FOUNDATION, INC.

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 JAN 1 , 2022, and ending DEC 31 , 2022

**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

BESSEMER VENTURE PARTNERS XI INSTITUTION

LP

1865 PALMER AVENUE, SUITE 104

LARCHMONT, NY 10538

**2(a)** EIN (if any)

98-1578750

**2(b)** Reference ID number

N/A

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

<b>4</b> Date of organization 01/13/2021	<b>5</b> Principal place of business CAYMAN ISLANDS	<b>6</b> Principal business activity code number 523900	<b>7</b> Principal business activity INVESTMENTS	<b>8a</b> Functional currency USD	<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

N/A

2 Check if the foreign partnership must file:

 Form 1042  Form 8804  Form 1065

Service Center where Form 1065 is filed:

E-FILE

3 Name and address of foreign partnership's agent in country of organization, if any  
MAPLES CORPORATE SERVICES LIMITED

P.O. BOX 309, UGLAND HOUSE

, GRAND CAYMAN CAYMAN ISLANDS KY1-110

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

SANDY GRIPPO

1865 PALMER AVENUE, SUITE 104

LARCHMONT, NY 10538

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 Regulations section 1.721(c)-1(b)(14)?

 Yes  No

7 Were any special allocations made by the foreign partnership?

 Yes  No8 Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities  
(FDEs) and Foreign Branches (FBs), attached to this return. See instructions

0

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

LTD PARTNERSHIP

10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a  
separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section  
1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b Yes  Nob If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations  
section 1.1503(d)-1(b)(5)(ii)? Yes  No11 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

LHA For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

Form **8865** (2022)

**12 a** Is the filer of this Form 8865 claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transaction with the foreign partnership? If "Yes," complete lines 12b, 12c, and 12d. See instructions .....  Yes  No

**b** Enter the amount of gross receipts derived from all sales of general property to the foreign partnership that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) .....

**c** Enter the amount of gross receipts derived from all sales of intangible property to the foreign partnership that the filer included in its computation of FDDEI .....

**d** Enter the amount of gross receipts derived from all services provided to the foreign partnership that the filer included in its computation of FDDEI .....

**13** Enter the number of foreign partners subject to section 864(c)(8) as a result of transferring all or a portion of an interest in the partnership or of receiving a distribution from the partnership .....

**14** At any time during the tax year were any transfers between the partnership and its partners subject to the disclosure requirements of Regulations section 1.707-8? .....  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 _____			
<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed PTIN
	Firm's name	Firm's EIN		
	Firm's address _____	Phone no. _____		

**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**  Owns a direct interest **b**  Owns a constructive interest

Name	Address	Identification number (if any)	Check if foreign person	Check if direct partner

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

Name	Address	Identification number (if any)	Check if foreign person

AVAILABLE UPON REQUEST

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

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
				<input type="checkbox"/>	%
				<input type="checkbox"/>	%
				<input type="checkbox"/>	%

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.

STMT 4	Name	Address	EIN (if any)	Total ordinary income or loss	Check if foreign partnership

## **SCHEDULE O (Form 8865)**

(Rev. October 2021)  
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**

GREATER MILWAUKEE FOUNDATION INC

**Filer's identifying number**

39-6036407

Name of foreign partnership BESSEMER VENTURE PARTNERS XI INSTITUTION  
LP

EIN (if any)  
98-1578750

N/A

1a Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1(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	12/31/22		381,887.				
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							
Totals			381,887.				

3 Enter the transferor's percentage interest in the partnership: (a) Before the transfer .1267 % (b) After the transfer .1267 %

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

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

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

Schedule Q (Form 8865) 10-2021

FORM 8865

AFFILIATION SCHEDULE

STATEMENT 4

NAME	ADDRESS	IDENTIFYING NUMBER	TOTAL ORDINARY INCOME OR (LOSS)	CK IF FOR-EIGN P'SH
HARLEM CAPITAL PARTNERS VE	1180 AVENUE OF THE AMERICA NEW YORK, NY 10036	85-4099171		
LASSO, LLC	1033 DEMONBREUN STREET, SU NASHVILLE, TN 37203	46-5600283		
CHAPTER ONE, PAGE TWO, LP	1450 2ND ST., BOX #260 SANTA MONICA, CA 90401	86-3116109		
FUND II, A SERIES OF THE M	PO BOX 3217 SEATTLE, WA 98114	85-1233480		
A\$AP CAPITAL, LP	PO BOX 3217 SEATTLE, WA 98114	87-3866689		
GROWTH WARRIOR CAPITAL, LP	PO BOX 3217 SEATTLE, WA 98114	87-4641556		
US HEALTH PARTNERS LLC	9600 BLACKWELL RD STE 250 ROCKVILLE, MD 20850	87-1101565		
THE NEW NORMAL FUND LP B	119 SOUTH MAIN STREET STE SEATTLE, WA 98104	APPLIED FOR		
FXP FUND I LP	73 LEVBERT ROAD NEWTON, MA 02459	86-3687194		
ESSENCE VC II, LP	PO BOX 3217 SEATTLE, WA 98114	86-2032857		
VIRTUE VENTURES FUND I LP	2913 CORBIN LANE AUSTIN, TX 78704	86-2659026		
JA FUND I, A SERIES OF APV	PO BOX 3217 SEATTLE, WA 98114	APPLIED FOR		X
BIT SPEC OPS BBS LLC	3500 SOUTH DUPONT HIGHWAY DOVER, DE 19901	87-2975852		X
6 MAN VENTURES FUND IIB LP	179 LUDLOW ST, APT 4 NEW YORK, NY 10002	87-3318414		
GARAGE CAPITAL FUND IV LP	3-435 WINCHESTER DRIVE WATERLOO ONTARIO CANADA N2	APPLIED FOR		X
GARAGE CAPITAL OPPORTUNITY	3-435 WINCHESTER DRIVE WATERLOO ONTARIO CANADA N2	APPLIED FOR		X
EUCLID VENTURE PARTNERS LP	2755 MCALLISTER STREET SAN FRANCISCO, CA 94118	87-1795579		
DI13 FUND I, ROLL UP VECHI	119 SOUTH MAIN ST STE 220 SEATTLE, WA 98104	92-1745117		

GREATER MILWAUKEE FOUNDATION, INC.39-6036407

UNION CAPITAL PARTNERS GRO	119 SOUTH MAIN ST STE 220 SEATTLE, WA 98104	36-5013811
HI10 FUND I, ROLL UP VECHI	119 SOUTH MAIN ST STE 220 SEATTLE, WA 98104	92-2180485
GAOCHENG FUND II, L.P.	89 NEXUS WAY, CAMANA BAY	98-1613111
BESSEMER INDIA CAPITAL HLD	GEORGETOWN CAYMAN ISLANDS IFS COURT, 28 CYBERCITY EBENE MAURITIUS 72201	98-0546930

X

X

Form **8865**Department of the Treasury  
Internal Revenue Service**Return of U.S. Persons With Respect to  
Certain Foreign Partnerships**

OMB No. 1545-1668

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**, 2022, and ending **DEC 31**

, 2022

**2022**Attachment  
Sequence No. **865**

Name of person filing this return

Filer's identification number

39-6036407

**GREATER MILWAUKEE FOUNDATION, INC.**

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 **JAN 1**, 2022, and ending **DEC 31**, 2022**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

ROCKET INTERNET CAPITAL PARTNERS SCS

**2(a)** EIN (if any)

98-1268470

8, RUE LOU HEMMER

SENNINGERBERG LUXEMBOURG L-1748

**2(b)** Reference ID number**G2** Name and address of foreign partnership's agent in country of organization, if any

AZTEC FINANCIAL SERVICES (LUXEMBOURG)

**3** Country under whose laws organized  
LUXEMBOURG

01/06/2015

5 Principal place of business  
LUXEMBOURG6 Principal business activity code number  
5239007 Principal business activity  
INVESTMENTS8a Functional currency  
USD

8b 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

N/A  Form 1042  Form 8804  Form 1065

2 Check if the foreign partnership must file:

 Form 1042  Form 8804  Form 1065

Service Center where Form 1065 is filed:

E-FILE

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

AZTEC FINANCIAL SERVICES (LUXEMBOURG)

4 Name and address of person(s) with custody of the books and records of the foreign

8 RUE LOU HEMMER

, SENNINGERBERG LUXEMBOURG L-1748

partnership, and the location of such books and records, if different

AZTEC FINANCIAL SERVICES (LUXEMBOURG)

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  NoIf "Yes," enter the total amount of the disallowed deductions  \$6 Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)?  Yes  No7 Were any special allocations made by the foreign partnership?  Yes  No

8 Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), attached to this return. See instructions

9 How is this partnership classified under the law of the country in which it's organized?  LTD PARTNERSHIP10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b  Yes  Nob If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations section 1.1503(d)-1(b)(5)(ii)?  Yes  No11 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

LHA For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

Form **8865** (2022)

**12 a** Is the filer of this Form 8865 claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transaction with the foreign partnership? If "Yes," complete lines 12b, 12c, and 12d. See instructions .....  Yes  No

**b** Enter the amount of gross receipts derived from all sales of general property to the foreign partnership that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) .....

**c** Enter the amount of gross receipts derived from all sales of intangible property to the foreign partnership that the filer included in its computation of FDDEI .....

**d** Enter the amount of gross receipts derived from all services provided to the foreign partnership that the filer included in its computation of FDDEI .....

**13** Enter the number of foreign partners subject to section 864(c)(8) as a result of transferring all or a portion of an interest in the partnership or of receiving a distribution from the partnership .....

**14** At any time during the tax year were any transfers between the partnership and its partners subject to the disclosure requirements of Regulations section 1.707-8? .....

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				
Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed
	Firm's name	Firm's EIN	PTIN	
	Firm's address	Phone no.		

**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**  Owns a direct interest      **b**  Owns a constructive interest

Name	Address	Identification number (if any)	Check if foreign person	Check if direct partner

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

Name	Address	Identification number (if any)	Check if foreign person

AVAILABLE UPON REQUEST

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

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
				<input type="checkbox"/>	% 	% 
				<input type="checkbox"/>	% 	% 

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.

Name	Address	EIN (if any)	Total ordinary income or loss	Check if foreign partner- ship

**SCHEDULE O**  
**(Form 8865)**(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service**Transfer of Property to a Foreign Partnership**  
**(Under Section 6038B)**

OMB No. 1545-1668

► 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.

Name of transferor

GREATER MILWAUKEE FOUNDATION, INC.

Filer's identifying number

39-6036407

Name of foreign partnership ROCKET INTERNET CAPITAL PARTNERS SCS

EIN (if any)

98-1268470

Reference ID number (see instr)

1a Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1(b)(14))? See instructions  Yes  Nob If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  Yes  No2 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	12/31/22		157,261.				
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							
Totals			157,261.				

3 Enter the transferor's percentage interest in the partnership: (a) Before the transfer .4810 % (b) After the transfer .4800 %

**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) 10-2021

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

Name of transferor

GREATER MILWAUKEE FOUNDATION INC.

**Identifying number** (see instructions)

39-6036407

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).

c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? .....  Yes  No

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<b>Name of parent corporation</b>	<b>EIN of parent corporation</b>
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d Have basis adjustments under section 367(a)(4) been made? .....

3 If the transferor was a partner in a partnership that was the actual transferor (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
DIGITAL ALPHA II-A, LP	98-1532247

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**b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? .....

<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> X	No
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**c** Is the partner disposing of its **entire** interest in the partnership? .....

<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> X	No
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**d** Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? .....

<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> X	No
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## Part II Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)  DA EDGE SOLUTIONS BLOCKER LLC	5a Identifying number, if any  98-1550670
6 Address (including country) 3535 EXECUTIVE TERMINAL DRIVE HENDERSON, NV 89052	5b Reference ID number
7 Country code of country of incorporation or organization CJ	
8 Foreign law characterization (see instructions) LLC	
9 Is the transferee foreign corporation a controlled foreign corporation? .....	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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	12/31/2022		152,528.		

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					
<b>Totals</b>					

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  Yes  No12a 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)						
<b>Totals</b>						

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)

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

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16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  
 (a) Before .591 % (b) After .591 %

17 Type of nonrecognition transaction (see instructions) ► NONE

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? .....

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

ATTACHMENT TO 12/31/22 FORM 926  
INFORMATION REQUIRED PURSUANT TO TREAS. REGULATION §1.6038B-1(C)

1. TRANSFEROR:

GREATER MILWAUKEE FOUNDATION, INC.  
EIN: 39-6036407  
101 W. PLEAANT, SUITE 210  
MILWAUKEE, WI 53212

2. TRANSFeree:

- i. DA EDGE SOLUTIONS BLOCKER LLC  
FEIN/REFERENCE ID: 98-1550670  
ADDRESS: SEE FORM 926 PART II  
COUNTRY OF INCORPORATION: SEE FORM 926 PART II
- ii. A GENERAL DESCRIPTION OF THE TRANSFER: A TRANSFER OF CASH OR PROPERTY IN A SECTION 351 TRANSACTION

3. CONSIDERATION RECEIVED:

ORDINARY SHARES

4. PROPERTY TRANSFERRED, INCLUDING THE ESTIMATED FAIR MARKET VALUE ("FMV") AND ADJUSTED BASIS ("AB") OF THE PROPERTY:

i. ACTIVE BUSINESS PROPERTY:	FMV \$152,528 AND BASIS \$152,528
ii. STOCK OR SECURITIES:	NOT APPLICABLE
iii. DEPRECIATED PROPERTY:	NOT APPLICABLE
iv. PROPERTY TO BE LEASED:	NOT APPLICABLE
v. PROPERTY TO BE SOLD:	NOT APPLICABLE
vi. TRANSFERS TO FSC'S:	NOT APPLICABLE
vii. TAINTED PROPERTY:	NOT APPLICABLE
viii. FOREIGN LOSS BRANCH:	NOT APPLICABLE
ix. OTHER INTANGIBLES:	NOT APPLICABLE

5. TRANSFERS OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

i. BRANCH OPERATION:	NOT APPLICABLE
ii. BRANCH PROPERTY:	NOT APPLICABLE
iii. PREVIOUSLY DEDUCTED LOSSES:	NOT APPLICABLE
iv. CHARACTER OF GAIN:	NOT APPLICABLE

6. APPLICATION OF SECTION 367(A)(5) NOT APPLICABLE

STATEMENT PURSUANT TO §1.351-3(A) BY

GREATER MILWAUKEE FOUNDATION, INC.  
EIN: 39-6036407

A SIGNIFICANT TRANSFEROR

1. THE NAME AND EMPLOYER IDENTIFICATION NUMBER (IF ANY) OF THE TRANSFeree CORPORATION:

Name: DA EDGE SOLUTIONS BLOCKER LLC  
EIN/REFERENCE ID: 98-150670

2. THE DATE(S) OF THE TRANSFER(S) OF ASSETS:

VARIOUS

3. THE AGGREGATE FAIR MARKET VALUE AND BASIS, DETERMINED IMMEDIATELY BEFORE THE EXCHANGE, OF PROPERTY TRANSFERRED BY SUCH TRANSFEROR IN THE EXCHANGE:

FMV: \$152,528  
BASIS: \$152,528

4. THE DATE AND CONTROL NUMBER OF ANY PRIVATE LETTER RULING(S) ISSUED BY THE INTERNAL REVENUE SERVICE IN CONNECTION WITH THIS SECTION 351 EXCHANGE: N/A

NOTE THAT PURSUANT TO §1.351-3(C), THE INFORMATION REQUIRED TO BE FILED BY THE TRANSFeree CORPORATION UNDER §1.351-3(B) IS NOT REQUIRED TO BE FILED BECAUSE THAT SAME INFORMATION IS INCLUDED ON THIS STATEMENT UNDER §1.351-3(A) AND WOULD BE INCLUDED ON THE SAME RETURN.

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

Name of transferor

GREATER MILWAUKEE FOUNDATION, INC.

**Identifying number** (see instructions)

39-6036407

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).

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.

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<b>Name of parent corporation</b>	<b>EIN of parent corporation</b>
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d Have basis adjustments under section 367(a)(4) been made? .....

3 If the transferor was a partner in a partnership that was the actual transferor (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
EIGHTFOLD REAL ESTATE CAPITAL FUND V, LP	36-4846127

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

4 Name of transferee (foreign corporation)  EIGHTFOLD REAL ESTATE CAPITAL FUND V CAYMAN CORP	5a Identifying number, if any  98-1337057
6 Address (including country)  CRICKET SQUARE, HUTCHINS DRIVE, PO BOX 2681 GRAND CAYMAN CAYMAN ISLANDS	5b 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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	12/31/2022		304,578.		

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					
<b>Totals</b>					

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  Yes  No12a 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)						
<b>Totals</b>						

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

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

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

16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
	(a) Before	<u>.594</u>	%
	(b) After	<u>.594</u>	%
17	Type of nonrecognition transaction (see instructions) ► <u>IRC SEC. 351</u>		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
a	Gain recognition under section 904(f)(3) .....	<input type="checkbox"/>	Yes
b	Gain recognition under section 904(f)(5)(F) .....	<input type="checkbox"/>	Yes
c	Recapture under section 1503(d) .....	<input type="checkbox"/>	Yes
d	Exchange gain under section 987 .....	<input type="checkbox"/>	Yes
19	Did this transfer result from a change in entity classification? .....	<input type="checkbox"/>	Yes
20	a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) .....	<input type="checkbox"/>	Yes
	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) .....	► \$	<input type="text"/>
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)? .....	<input type="checkbox"/>	Yes
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 .....	<input type="checkbox"/>	Yes
		<input checked="" type="checkbox"/>	No

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Form 926 (Rev. 11-2018)

ATTACHMENT TO 12/31/22 FORM 926  
INFORMATION REQUIRED PURSUANT TO TREAS. REGULATION §1.6038B-1(C)

1. TRANSFEROR:

GREATER MILWAUKEE FOUNDATION, INC.  
EIN: 39-6036407  
101 W. PLEAANT, SUITE 210  
MILWAUKEE, WI 53212

2. TRANSFeree:

- i. EIGHTFOLD REAL ESTATE CAPITAL FUND V CAYMAN CORPORATION  
FEIN/REFERENCE ID: 98-4846127  
ADDRESS: SEE FORM 926 PART II  
COUNTRY OF INCORPORATION: SEE FORM 926 PART II
- ii. A GENERAL DESCRIPTION OF THE TRANSFER: A TRANSFER OF CASH OR PROPERTY IN A SECTION 351 TRANSACTION

3. CONSIDERATION RECEIVED:

ORDINARY SHARES

4. PROPERTY TRANSFERRED, INCLUDING THE ESTIMATED FAIR MARKET VALUE ("FMV") AND ADJUSTED BASIS ("AB") OF THE PROPERTY:

i. ACTIVE BUSINESS PROPERTY:	FMV \$304,578 AND BASIS \$304,578
ii. STOCK OR SECURITIES:	NOT APPLICABLE
iii. DEPRECIATED PROPERTY:	NOT APPLICABLE
iv. PROPERTY TO BE LEASED:	NOT APPLICABLE
v. PROPERTY TO BE SOLD:	NOT APPLICABLE
vi. TRANSFERS TO FSC'S:	NOT APPLICABLE
vii. TAINTED PROPERTY:	NOT APPLICABLE
viii. FOREIGN LOSS BRANCH:	NOT APPLICABLE
ix. OTHER INTANGIBLES:	NOT APPLICABLE

5. TRANSFERS OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

i. BRANCH OPERATION:	NOT APPLICABLE
ii. BRANCH PROPERTY:	NOT APPLICABLE
iii. PREVIOUSLY DEDUCTED LOSSES:	NOT APPLICABLE
iv. CHARACTER OF GAIN:	NOT APPLICABLE

6. APPLICATION OF SECTION 367(A)(5) NOT APPLICABLE

STATEMENT PURSUANT TO §1.351-3(A) BY

GREATER MILWAUKEE FOUNDATION, INC.  
EIN: 39-6036407

A SIGNIFICANT TRANSFEROR

1. THE NAME AND EMPLOYER IDENTIFICATION NUMBER (IF ANY) OF THE TRANSFeree CORPORATION:

Name: EIGHTFOLD REAL ESTATE CAPITAL FUND V CAYMAN CORPORATION  
EIN/REFERENCE ID: 98-4846127

2. THE DATE(S) OF THE TRANSFER(S) OF ASSETS:

VARIOUS

3. THE AGGREGATE FAIR MARKET VALUE AND BASIS, DETERMINED IMMEDIATELY BEFORE THE EXCHANGE, OF PROPERTY TRANSFERRED BY SUCH TRANSFEROR IN THE EXCHANGE:

FMV: \$304,578  
BASIS: \$304,578

4. THE DATE AND CONTROL NUMBER OF ANY PRIVATE LETTER RULING(S) ISSUED BY THE INTERNAL REVENUE SERVICE IN CONNECTION WITH THIS SECTION 351 EXCHANGE: N/A

NOTE THAT PURSUANT TO §1.351-3(C), THE INFORMATION REQUIRED TO BE FILED BY THE TRANSFeree CORPORATION UNDER §1.351-3(B) IS NOT REQUIRED TO BE FILED BECAUSE THAT SAME INFORMATION IS INCLUDED ON THIS STATEMENT UNDER §1.351-3(A) AND WOULD BE INCLUDED ON THE SAME RETURN.

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

Name of transferor

GREATER MILWAUKEE FOUNDATION INC.

**Identifying number** (see instructions)

39-6036407

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).

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.

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<b>Name of parent corporation</b>	<b>EIN of parent corporation</b>
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d Have basis adjustments under section 367(a)(4) been made? .....

3 If the transferor was a partner in a partnership that was the actual transferor (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.

<b>Name of partnership</b>	<b>EIN of partnership</b>
PC FEEDER VI, L.P.	98-1522095

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

4 Name of transferee (foreign corporation)  PC FEEDER VI, L.P.	5a Identifying number, if any  98-1522095
6 Address (including country)  3RD FL, LIBERATION HOUSE, CASTLE ST ST HELIER JE4 8PN JERSEY	5b Reference ID number
7 Country code of country of incorporation or organization  JE	
8 Foreign law characterization (see instructions)  CORPORATION	
9 Is the transferee foreign corporation a controlled foreign corporation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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	12/31/2022		1,535,006.		

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					
<b>Totals</b>					

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  Yes  No12a 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)						
<b>Totals</b>						

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)

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

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16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  
 (a) Before 1.254 % (b) After 1.254 %

17 Type of nonrecognition transaction (see instructions) ► IRC SEC. 351

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

a 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? .....

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

ATTACHMENT TO 12/31/22 FORM 926  
INFORMATION REQUIRED PURSUANT TO TREAS. REGULATION §1.6038B-1(C)

1. TRANSFEROR:

GREATER MILWAUKEE FOUNDATION, INC.  
EIN: 39-6036407  
101 W. PLEAANT, SUITE 210  
MILWAUKEE, WI 53212

2. TRANSFeree:

- i. PC FEEDER VI L.P.  
FEIN/REFERENCE ID: 98-1522095  
ADDRESS: SEE FORM 926 PART II  
COUNTRY OF INCORPORATION: SEE FORM 926 PART II
- ii. A GENERAL DESCRIPTION OF THE TRANSFER: A TRANSFER OF CASH OR PROPERTY IN A SECTION 351 TRANSACTION

3. CONSIDERATION RECEIVED:

ORDINARY SHARES

4. PROPERTY TRANSFERRED, INCLUDING THE ESTIMATED FAIR MARKET VALUE ("FMV") AND ADJUSTED BASIS ("AB") OF THE PROPERTY:

- i. ACTIVE BUSINESS PROPERTY: FMV \$1,535,006 AND BASIS \$1,535,006
- ii. STOCK OR SECURITIES: NOT APPLICABLE
- iii. DEPRECIATED PROPERTY: NOT APPLICABLE
- iv. PROPERTY TO BE LEASED: NOT APPLICABLE
- v. PROPERTY TO BE SOLD: NOT APPLICABLE
- vi. TRANSFERS TO FSC'S: NOT APPLICABLE
- vii. TAINTED PROPERTY: NOT APPLICABLE
- viii. FOREIGN LOSS BRANCH: NOT APPLICABLE
- ix. OTHER INTANGIBLES: NOT APPLICABLE

5. TRANSFERS OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

- i. BRANCH OPERATION: NOT APPLICABLE
- ii. BRANCH PROPERTY: NOT APPLICABLE
- iii. PREVIOUSLY DEDUCTED LOSSES: NOT APPLICABLE
- iv. CHARACTER OF GAIN: NOT APPLICABLE

6. APPLICATION OF SECTION 367(A)(5) NOT APPLICABLE

STATEMENT PURSUANT TO §1.351-3(A) BY

GREATER MILWAUKEE FOUNDATION, INC.  
EIN: 39-6036407

A SIGNIFICANT TRANSFEROR

1. THE NAME AND EMPLOYER IDENTIFICATION NUMBER (IF ANY) OF THE TRANSFeree CORPORATION:

Name: PC FEEDER VI L.P.  
EIN/REFERENCE ID: 98-1522095

2. THE DATE(S) OF THE TRANSFER(S) OF ASSETS:

VARIOUS

3. THE AGGREGATE FAIR MARKET VALUE AND BASIS, DETERMINED IMMEDIATELY BEFORE THE EXCHANGE, OF PROPERTY TRANSFERRED BY SUCH TRANSFEROR IN THE EXCHANGE:

FMV: \$1,535,006  
BASIS: \$1,535,006

4. THE DATE AND CONTROL NUMBER OF ANY PRIVATE LETTER RULING(S) ISSUED BY THE INTERNAL REVENUE SERVICE IN CONNECTION WITH THIS SECTION 351 EXCHANGE: N/A

NOTE THAT PURSUANT TO §1.351-3(C), THE INFORMATION REQUIRED TO BE FILED BY THE TRANSFeree CORPORATION UNDER §1.351-3(B) IS NOT REQUIRED TO BE FILED BECAUSE THAT SAME INFORMATION IS INCLUDED ON THIS STATEMENT UNDER §1.351-3(A) AND WOULD BE INCLUDED ON THE SAME RETURN.

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

Name of transferor

GREATER MILWAUKEE FOUNDATION, INC.

**Identifying number** (see instructions)

39-6036407

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).

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.

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Name of parent corporation	EIN of parent corporation
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d Have basis adjustments under section 367(a)(4) been made? .....

3 If the transferor was a partner in a partnership that was the actual transferor (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.

<b>Name of partnership</b>	<b>EIN of partnership</b>
PC FEEDER V L.P.	98-1239867

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

4 Name of transferee (foreign corporation)  PC FEEDER V L.P.	5a Identifying number, if any  98-1239867
6 Address (including country) 28-34 HILL STREET ST HELIER JE4 8PN JERSEY	5b Reference ID number
7 Country code of country of incorporation or organization JE	
8 Foreign law characterization (see instructions) CORPORATION	
9 Is the transferee foreign corporation a controlled foreign corporation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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	12/31/2022		210,363.		

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					
<b>Totals</b>					

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)						
<b>Totals</b>						

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)**

**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	640	%
	(b) After	640	%
17	Type of nonrecognition transaction (see instructions) ► <u>IRC SEC. 351</u>		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
a	Gain recognition under section 904(f)(3) .....		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
b	Gain recognition under section 904(f)(5)(F) .....		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
c	Recapture under section 1503(d) .....		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
d	Exchange gain under section 987 .....		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
19	Did this transfer result from a change in entity classification? .....		
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) .....		
	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)? .....		
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 .....		

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Form 926 (Rev. 11-2018)

ATTACHMENT TO 12/31/22 FORM 926  
INFORMATION REQUIRED PURSUANT TO TREAS. REGULATION §1.6038B-1(C)

1. TRANSFEROR:

GREATER MILWAUKEE FOUNDATION, INC.  
EIN: 39-6036407  
101 W. PLEAANT, SUITE 210  
MILWAUKEE, WI 53212

2. TRANSFeree:

- i. PC FEEDER V L.P.  
FEIN/REFERENCE ID: 98-1239867  
ADDRESS: SEE FORM 926 PART II  
COUNTRY OF INCORPORATION: SEE FORM 926 PART II
- ii. A GENERAL DESCRIPTION OF THE TRANSFER: A TRANSFER OF CASH OR PROPERTY IN A SECTION 351 TRANSACTION

3. CONSIDERATION RECEIVED:

ORDINARY SHARES

4. PROPERTY TRANSFERRED, INCLUDING THE ESTIMATED FAIR MARKET VALUE ("FMV") AND ADJUSTED BASIS ("AB") OF THE PROPERTY:

- i. ACTIVE BUSINESS PROPERTY: FMV \$210,363 AND BASIS \$210,363
- ii. STOCK OR SECURITIES: NOT APPLICABLE
- iii. DEPRECIATED PROPERTY: NOT APPLICABLE
- iv. PROPERTY TO BE LEASED: NOT APPLICABLE
- v. PROPERTY TO BE SOLD: NOT APPLICABLE
- vi. TRANSFERS TO FSC'S: NOT APPLICABLE
- vii. TAINTED PROPERTY: NOT APPLICABLE
- viii. FOREIGN LOSS BRANCH: NOT APPLICABLE
- ix. OTHER INTANGIBLES: NOT APPLICABLE

5. TRANSFERS OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

- i. BRANCH OPERATION: NOT APPLICABLE
- ii. BRANCH PROPERTY: NOT APPLICABLE
- iii. PREVIOUSLY DEDUCTED LOSSES: NOT APPLICABLE
- iv. CHARACTER OF GAIN: NOT APPLICABLE

6. APPLICATION OF SECTION 367(A)(5) NOT APPLICABLE

STATEMENT PURSUANT TO §1.351-3(A) BY

GREATER MILWAUKEE FOUNDATION, INC.  
EIN: 39-6036407

A SIGNIFICANT TRANSFEROR

1. THE NAME AND EMPLOYER IDENTIFICATION NUMBER (IF ANY) OF THE TRANSFeree CORPORATION:

Name: PC FEEDER V L.P.  
EIN/REFERENCE ID: 98-1239867

2. THE DATE(S) OF THE TRANSFER(S) OF ASSETS:

VARIOUS

3. THE AGGREGATE FAIR MARKET VALUE AND BASIS, DETERMINED IMMEDIATELY BEFORE THE EXCHANGE, OF PROPERTY TRANSFERRED BY SUCH TRANSFEROR IN THE EXCHANGE:

FMV: \$210,363  
BASIS: \$210,363

4. THE DATE AND CONTROL NUMBER OF ANY PRIVATE LETTER RULING(S) ISSUED BY THE INTERNAL REVENUE SERVICE IN CONNECTION WITH THIS SECTION 351 EXCHANGE: N/A

NOTE THAT PURSUANT TO §1.351-3(C), THE INFORMATION REQUIRED TO BE FILED BY THE TRANSFeree CORPORATION UNDER §1.351-3(B) IS NOT REQUIRED TO BE FILED BECAUSE THAT SAME INFORMATION IS INCLUDED ON THIS STATEMENT UNDER §1.351-3(A) AND WOULD BE INCLUDED ON THE SAME RETURN.

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

Name of transferor

GREATER MILWAUKEE FOUNDATION, INC.

**Identifying number** (see instructions)

39-6036407

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).

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.

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Name of parent corporation	EIN of parent corporation
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d Have basis adjustments under section 367(a)(4) been made? .....

3 If the transferor was a partner in a partnership that was the actual transferor (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		
SPARK CAPITAL GROWTH FUND IV, L.P.	87-3002554		
<p><b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><b>c</b> Is the partner disposing of its <b>entire</b> interest in the partnership? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><b>d</b> Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>			

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

4 Name of transferee (foreign corporation)  FIREBLOCKS LTD	5a Identifying number, if any
6 Address (including country) 150 BEGIN MENACHEM RD TEL AVIV JAFFA 6492105 ISRAEL	5b Reference ID number  FIRE54
7 Country code of country of incorporation or organization IS	
8 Foreign law characterization (see instructions) CORPORATION	
9 Is the transferee foreign corporation a controlled foreign corporation? .....	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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	12/31/2022		138,795.		

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					
<b>Totals</b>					

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  Yes  No12a 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)						
<b>Totals</b>						

**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)

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

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**16** Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  
**(a)** Before \_\_\_\_\_ .000 % **(b)** After \_\_\_\_\_ .002 %

**17** Type of nonrecognition transaction (see instructions) ► IRC SEC. 351

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

**a** 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? .....

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

ATTACHMENT TO 12/31/22 FORM 926  
INFORMATION REQUIRED PURSUANT TO TREAS. REGULATION §1.6038B-1(C)

1. TRANSFEROR:

GREATER MILWAUKEE FOUNDATION, INC.  
EIN: 39-6036407  
101 W. PLEAANT, SUITE 210  
MILWAUKEE, WI 53212

2. TRANSFeree:

- i. FIREBLOCKS LTD  
FEIN/REFERENCE ID: FIRE54  
ADDRESS: SEE FORM 926 PART II  
COUNTRY OF INCORPORATION: SEE FORM 926 PART II
- ii. A GENERAL DESCRIPTION OF THE TRANSFER: A TRANSFER OF CASH OR PROPERTY IN A SECTION 351 TRANSACTION

3. CONSIDERATION RECEIVED:

ORDINARY SHARES

4. PROPERTY TRANSFERRED, INCLUDING THE ESTIMATED FAIR MARKET VALUE ("FMV") AND ADJUSTED BASIS ("AB") OF THE PROPERTY:

i. ACTIVE BUSINESS PROPERTY:	FMV \$138,795 AND BASIS \$138,795
ii. STOCK OR SECURITIES:	NOT APPLICABLE
iii. DEPRECIATED PROPERTY:	NOT APPLICABLE
iv. PROPERTY TO BE LEASED:	NOT APPLICABLE
v. PROPERTY TO BE SOLD:	NOT APPLICABLE
vi. TRANSFERS TO FSC'S:	NOT APPLICABLE
vii. TAINTED PROPERTY:	NOT APPLICABLE
viii. FOREIGN LOSS BRANCH:	NOT APPLICABLE
ix. OTHER INTANGIBLES:	NOT APPLICABLE

5. TRANSFERS OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

i. BRANCH OPERATION:	NOT APPLICABLE
ii. BRANCH PROPERTY:	NOT APPLICABLE
iii. PREVIOUSLY DEDUCTED LOSSES:	NOT APPLICABLE
iv. CHARACTER OF GAIN:	NOT APPLICABLE

6. APPLICATION OF SECTION 367(A)(5) NOT APPLICABLE

**STATEMENT PURSUANT TO §1.351-3(A) BY**

**GREATER MILWAUKEE FOUNDATION, INC.**  
**EIN: 39-6036407**

**A SIGNIFICANT TRANSFEROR**

- 1. THE NAME AND EMPLOYER IDENTIFICATION NUMBER (IF ANY) OF THE TRANSFeree CORPORATION:**

**Name: FIREBLOCKS LTD**  
**EIN/REFERENCE ID: FIRE54**

- 2. THE DATE(S) OF THE TRANSFER(S) OF ASSETS:**

**VARIOUS**

- 3. THE AGGREGATE FAIR MARKET VALUE AND BASIS, DETERMINED IMMEDIATELY BEFORE THE EXCHANGE, OF PROPERTY TRANSFERRED BY SUCH TRANSFEROR IN THE EXCHANGE:**

**FMV: \$138,795**  
**BASIS: \$138,795**

- 4. THE DATE AND CONTROL NUMBER OF ANY PRIVATE LETTER RULING(S) ISSUED BY THE INTERNAL REVENUE SERVICE IN CONNECTION WITH THIS SECTION 351 EXCHANGE: N/A**

**NOTE THAT PURSUANT TO §1.351-3(C), THE INFORMATION REQUIRED TO BE FILED BY THE TRANSFeree CORPORATION UNDER §1.351-3(B) IS NOT REQUIRED TO BE FILED BECAUSE THAT SAME INFORMATION IS INCLUDED ON THIS STATEMENT UNDER §1.351-3(A) AND WOULD BE INCLUDED ON THE SAME RETURN.**