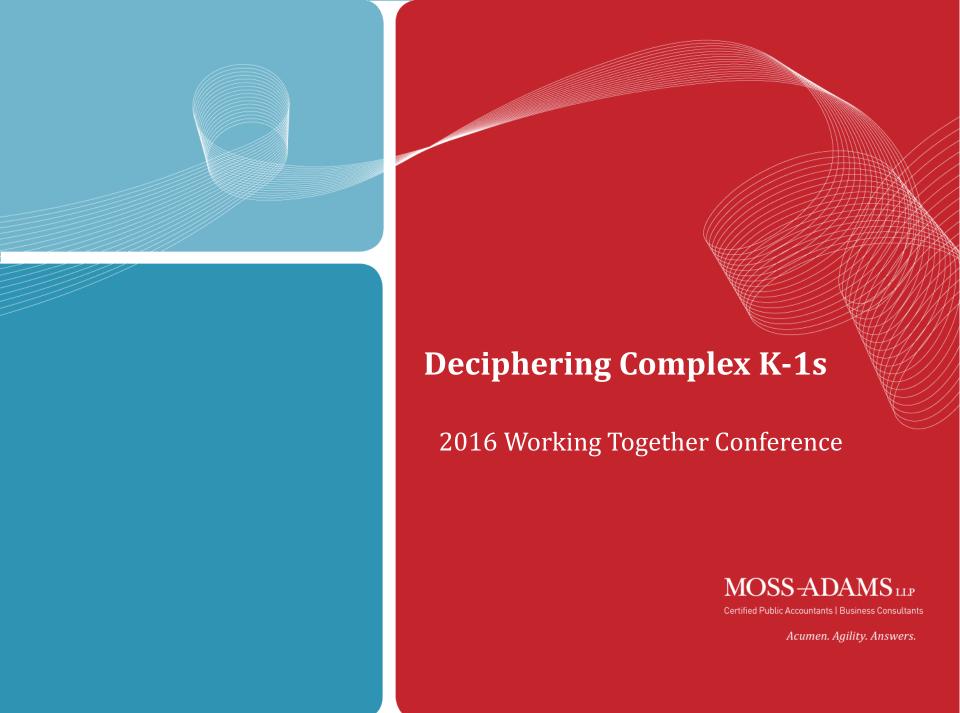
Presenter: Jerri Eckmann, CPA

# Bio:

Jerri is a tax senior manager who has practiced in public accounting for 15 years and has been with Moss Adams LLP since 2004. She graduated with a BA in accounting from Oglethorpe University in Atlanta, GA and a Masters in Tax degree from Golden Gate University. She focuses on complex partnership and S corporation tax. During her free time, she enjoys spending time with her 2 boys and road tripping to National Parks.



The material appearing in this presentation is for informational purposes only and is not legal or accounting advice. Communication of this information is not intended to create, and receipt does not constitute, a legal relationship, including, but not limited to, an accountant-client relationship. Although these materials may have been prepared by professionals, they should not be used as a substitute for professional services. If legal, accounting, or other professional advice is required, the services of a professional should be sought.

# Agenda

- In general:
  - What are hedge funds and what is the investment advantage?
  - How does that compare to PTPs? (Publicly Traded Partnerships)
- What complexities arise when preparing returns that include such K-1s?
- Review of example K-1 and tax return
  - Step-by-step guide to inputting the various items
  - Deciphering related footnote disclosures
    - Passive vs. Non-passive
    - International/foreign
    - States
- Other considerations
  - Tracking tax basis
  - Net Investment Income Tax



# What is a hedge fund and what is an advantage of investing in these funds?

A **hedge fund** is an investment fund that can undertake a wider range of investment and trading activities than other funds, but which is generally only open to certain types of investors specified by regulators. These investors include certain high-net-worth individuals, who are generally considered to have the knowledge or resources to understand the nature of the funds.

One advantage of such an investment is that it allows investors to pursue higher, but less volatile, returns than the returns available to the public at large from direct investment in publicly-traded stocks and securities.

In addition, the portion of passive income generated from these funds can offset other passive losses from other investments.

However, investments in hedge funds do add complexity to the preparation of high-net-worth individuals.

# How do investments in Hedge Funds differ from investments in PTPs?

A **PTP** is a partnership the interests of which are traded on an established securities market (national or local exchange, or an over-the-counter market) or are readily tradable on a secondary market (or the substantial equivalent).

A partner's net passive income for a tax year from a PTP can't be offset by losses from other passive activities. Thus, a partner who doesn't materially participate in the operations of a publicly traded partnership is allowed to deduct his share of the partnership losses only to the extent of future income from the partnership or when the entire interest is sold.

Gain or loss on the disposition of the interest could be a combination of both ordinary and capital, depending on any "hot assets".

# Compliance Complexities

- Basis tracking
- Multiple lines and multiple disclosures
- Determining passive vs. non-passive treatment in regards to trader or lending vs. investor activities
- Reporting multiple activities
- Unfamiliar items (example Section 59(e) expenditures)
- DPAD Domestic Production Activities Deduction
- Net Investment Income Tax
- Foreign items and foreign tax credit
- International disclosures and required filings
- State disclosures and required filings



# "Extreme" example K-1 – notes

- Create an excel template to track all K-1 line items and to track non-passive activities (PTP, Trading and Lending) and passive (Investor) activities
  - 1.469-1T and 2T Regs cover the trading and lending activities
  - Generally, these activities are disclosed in footnotes. If not, you should inquire.
- Reconcile taxable income/loss to K-1
- Track overall tax basis in the partnership/fund
  - Review Section L of K-1. Tax basis? Or do you need to maintain separately?
  - PTP dispositions could have ordinary component. This info is usually provided in footnotes.
  - Don't trust the broker's provided basis usually this represents original cost

# "Extreme" example K-1 – notes

- From K-1, report each individual passive activity separately. This will allow deduction of suspended passive losses upon disposition of that passive activity.
- From K-1, report each PTP activity separately.
  - PTP passive losses can't be used to offset passive income from other activities, including other PTPs.
  - Suspended passive losses can be taken only upon the disposition of that PTP.
  - PTPs are treated as if they are the only passive activity owned by the taxpayer.
- All other non-passive trader/lender activity can be summed together and input
  - Generally, line 11f includes a footnote detailing income and deduction items related to trader/lender activities
  - Trader deductions represent more "above the line" deductions that are generally more beneficial at the federal and state level than non-trader portfolio deductions.

# "Extreme" example K-1 – notes

- Net Investment Income Tax (NIIT) applies to both passive activities and trader/lending activities
- International -
  - Forms 8886 & 8621 may not be required at individual level if partnership already filed
  - Form 926 may be required if total direct and indirect transfers exceed \$100,000
  - PFIC considerations
- States materiality, ability to carryover or back NOLs, composites filed or any withholdings made by partnership should be reviewed

# Final considerations

- Questions?
- Best Practices to share?





July 29, 2016

#### Dear Limited Partner:

Please find your Final 2015 Federal Schedule K-1 for The Washing Fund I L.P. (the "Fund") listing your distributive share of taxable items of income, gain, deduction and loss, and certain other supplemental information for the year ended December 31, 2015. This information is to be used in the preparation of your federal, state and local tax returns.

The Fund holds interests in partnerships and other pass-through entities. As a pass-through entity, the Fund has passed your allocable share of income and expense items from these other entities through to you in the same character as received by the Fund. Certain information reflected on your Schedule K-1 is based on estimates received from underlying investments. To the extent that material information is received from such underlying investments subsequent to the date hereof, such information will be disclosed to you. Please consult your tax advisor regarding footnote disclosures in the Schedule K-1 that may necessitate additional reporting requirements, as failure to comply with applicable reporting obligations may result in penalties and interest.

Your 2015 state income information is presented on the Schedule K-1 supporting schedules. Separate Schedule K-1s are attached for California, Connecticut, New Jersey, and New York. Additionally, separate withholding credit vouchers are attached for California and Oklahoma. You may or may not be required to file income tax returns for the states listed due to state requirements and/or limited activity in the state. We recommend that you consult your tax advisor regarding your state tax filing requirements.

Please note that the Fund's tax return and partner allocations of partnership tax items are subject to examination by the federal, state and local taxing authorities. If such examinations result in changes to the amount or classification of the Fund's items reported on your Schedule K-1, your tax liability may be affected. We are not in a position to assure you that this will not happen because the Internal Revenue Code and applicable regulations are susceptible to differing interpretations.

Please consult your tax advisor to determine your tax implications with respect to this information, as individual investor tax characteristics will vary based on many factors, including, but not limited to, the timing and size of your investment in the Fund.

If you have any questions, please feel free to contact Capital Management, LLC at (Management, LLC) at (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management) and Management (Management) are the contact Capital Management (Management

Regards,

Capital Management, LLC
General Partner to The

651113 Final K-1 Amended K-1 OMB No. 1545-0123 2015 Part III Partner's Share of Current Year Income, Schedule K-1 (Form 1065) Deductions, Credits, and Other Items For calendar year 2015, or tax Department of the Treasury Internal Revenue Service year beginning (487)Net rental real estate income (loss) Partner's Share of Income, Deductions, Other net rental income (loss) Foreign transactions Credits, etc. ▶ See back of form and separate instructions. STMI Part I Information About the Partnership Guaranteed payments Partnership's employer identification number Interest Income Partnership's name, address, city, state, and ZIP code 7,261 Ordinary dividends THE FUND I L.P. 6a 7,981 Qualified dividends 5,450 Royalties IRS Center where partnership filed return OGDEN, UT Net short-term capital gain (loss) D Check if this is a publicly traded partnership (PTP) Net long-term capital gain (loss) Alternative minimum tax (AMT) items Part II Information About the Partner Partner's identifying number STMT Collectibles (28%) gain (loss) XXXXX5593 Partner's name, address, city, state, and ZIP code PARTNER #8 9c Unrecaptured section 1250 gain 10 Net section 1231 gain (loss) Tax-exempt income and nondeductible expenses 61 Other income (loss) Α 1,423 X Limited partner or other LLC G General partner or LLC STMI member-manager member н X Domestic partner Foreign partner 2 11 What type of entity is this partner? INDIVIDUAL 411 Distributions 12 If this partner is a retirement plan (IRA/SEP/Keogh/etc.), check here Section 179 deduction .1 Partner's share of profit, loss, and capital (see instructions): 13 Other deductions Beginning Ending Other information 0.0834% 0.0839% STMT Profit Loss 0.0834% 0.0839% 0.0834% Capital 0.0839% STMT Partner's share of liabilities at year end: 14 | Self-employment earnings (loss) Nonrecourse . . . . . . 762,464 Qualified nonrecourse financing . Recourse . . . \*See attached statement for additional information Partner's capital account analysis: Beginning capital account . . . 4,022,041 022.02

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

X GAAP

Capital contributed during the year

Current year increase (decrease). Withdrawals & distributions , ,

Ending capital account . . . .

Tax basis

Other (explain)

For IRS Use Only

66,257

4,088,298

Section 704(b) book

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

PARTNER #84

1.	Ordinary business income (loss). Determine	whether the income (loss) is		Code	Report on
	passive or nonpassive and enter on your return			L Empowerment zone	ነ
	Passive loss	Report on See the Partner's Instructions		employment credit	
	Passive income	Schedule E, line 28, column (g)		M Credit for increasing research	
	Nonpassive loss	Schedule E, line 28, column (h)		activities	See the Partner's Instructions
	Nonpassive income	Schedule E, line 28, column (j)		N Credit for employer social security	1
2.	Net rental real estate income (loss)	See the Partner's Instructions		and Medicare taxes	
3,	Other net rental income (loss)			Backup withholding	
	Net income	Schedule E, line 28, column (g)		P Other credits	J
	Net loss	See the Partner's Instructions	16.	Foreign transactions	•
4. 5.	Guaranteed payments Interest income	Schedule E, line 28, column (j) Form 1040, line 8a		A Name of country or U.S. possession	1
6a.	Ordinary dividends	Form 1040, line 9a		B Gross income from all sources	Form 1116, Part I
6b.	Qualified dividends	Form 1040, line 9b		C Gross income sourced at	1 5AA 1135,1 GICT
7.	Royalties	Schedule E, line 4		partner level	]
8.	Net short-term capital gain (loss)	Schedule D, line 5		Foreign gross income sourced at partnership level	
9a.	Net long-term capital gain (loss)	Schedule D, line 12		D Passive category	1
9b,	Collectibles (28%) gain (loss)	28% Rate Gain Worksheet, line 4		E General category	Form 1116, Part I
_		(Schedule D instructions)		F Other	J
9c,		See the Partner's Instructions		Deductions allocated and apportioned at partner level	
10. 11.	Net section 1231 gain (loss) Other income (loss)	See the Partner's Instructions		G Interest expense H Other	Form 1116, Part I
	Code			Deductions allocated and apportioned at partnership to	Form 1116, Part I
	A Other portfolio income (loss)	See the Partner's Instructions		іпсоте	ver to loveigh source
	B Involuntary conversions	See the Partner's Instructions		Passive category	1
	C Sec. 1256 contracts & straddles	Form 6781, line 1		J General category	Form 1116, Part I
	D Mining exploration costs recapture	See Pub, 535		K Other	J
	E Cancellation of debt	Form 1040, line 21 or Form 982		Other information	
	F Other income (loss)	See the Partner's Instructions		L Total foreign taxes paid	Form 1116, Part II
12.		See the Partner's Instructions		M - Total foreign taxes accrued	Form 1116, Part II
13.	Other deductions			N Reduction in taxes available for credit	Form 1116, line 12
	A Cash contributions (50%)	}		O Foreign trading gross receipts	Form 8873
	B Cash contributions (30%)			P Extraterritorial income exclusion	Form 8873
	C Noncash contributions (50%)  D Noncash contributions (30%)	See the Partner's	17.	Q Other foreign transactions	See the Partner's Instructions
	E Capital gain property to a 50%	Instructions	17.	Alternative minimum tax (AMT) items  A Post-1986 depreciation adjustment	
	organization (30%)	n jan gottor ja		B Adjusted gain or loss	See the Partner's
	F Capital gain property (20%)			C Depletion (other than oil & gas)	Instructions and
	G Contributions (100%)	1		D Oil, gas, & geothermal—gross income	the Instructions for
	H Investment interest expense	Form 4952, line 1		E Oil, gas, & geothermal—deductions	Form 6251
	I Deductions—royalty income	Schedule E, line 19		F Other AMT items	)
	J Section 59(e)(2) expenditures	See the Partner's Instructions	18.	Tax-exempt income and nondeductible expenses	
	K Deductions—portfolio (2% floor)	Schedule A, line 23		A Tax-exempt interest income	Form 1040, line 8b
	L Deductions—portfolio (other)	Schedule A, line 28		B Other tax-exempt income	See the Partner's Instructions
	M Amounts paid for medical insurance	Schedule A, line 1 or Form 1040, line 29		C Nondeductible expenses	See the Partner's Instructions
	N Educational assistance benefits	See the Partner's Instructions	19.	Distributions	`
	O Dependent care benefits	Form 2441, line 12		A Cash and marketable securities	Lauren et et et et
	P Preproductive period expenses  Q Commercial revitalization deduction	See the Partner's Instructions		B Distribution subject to section 737 C Other property	See the Partner's Instructions
	from rental real estate activities	See Form 8582 instructions	20,	Other information	,
	R Pensions and IRAs	See the Partner's Instructions		A Investment income	Form 4952, line 4a
	S Reforestation expense deduction	See the Partner's Instructions		B Investment expenses	Form 4952, line 5
	T Domestic production activities			C Fuel tax credit information	Form 4136
	information	See Form 8903 instructions		<ul> <li>Qualified rehabilitation expenditures</li> </ul>	
	U Qualified production activities income	Form 8903, line 7b		(other than rental real estate)	See the Partner's Instructions
	V Employer's Form W-2 wages	Form 8903, line 17		E Basis of energy property	See the Partner's Instructions
	W Other deductions	See the Partner's Instructions		F Recapture of low-income housing	
	Self-employment earnings (loss)	4		credit (section 42(j)(5))	Form 8611, line 8
	e, If you have a section 179 deduction or any pa			G Recapture of low-income housing	F 0044 (5 0
rall	ner's Instructions before completing Schedule S A Net earnings (loss) from	<b>L</b> .		credit (other)  H Recapture of investment credit	Form 8611, line 8 See Form 4255
	self-employment	Schedule SE, Section A or B		Recapture of other credits	See the Partner's Instructions
	B Gress farming or fishing income	See the Partner's Instructions		J Look-back interest—completed	See Form 8697
	C Gross non-farm income	See the Partner's Instructions		long-term contracts	<del></del>
15.	Credits			K Look-back interest—income forecast	See Form 8866
	A Low-income housing credit			method	
	(section 42(j)(5)) from pre-2008			L Dispositions of property with	
	buildings			section 179 deductions	
	B Low-income housing credit			M Recapture of section 179 deduction	
	(other) from pre-2008 buildings			N Interest expense for corporate	
	C Low-income housing credit (section 42(j)(5)) from			partners  O Section 453(I)(3) information	
	post-2007 buildings	See the Partner's Instructions		O Section 453(I)(3) information P Section 453A(c) information	
	D Low-income housing credit	/ See also real and a medical of the		Q Section 1260(b) information	
	(other) from post-2007			R Interest allocable to production	See the Partner's
	buildings	· · · · · ·		expenditures	Instructions
	E Qualified rehabilitation			S CCF nonqualified withdrawals	1
	expenditures (rental real estate)			T Depletion information—oil and gas	
	F Other rental real estate credits	}		U Reserved	
	G Other rental credits			V Unrelated business taxable income	
	H Undistributed capital gains credit	Form 1040, line 73; check box a		W Precontribution gain (loss)	
	Biofuel producer credit     Medicappath pith eradit	Con the Destacute Institute		X Section 108(i) information	1
	J Work opportunity credit K Disabled access credit	See the Partner's Instructions		Y Net investment income Z Other information	<i>)</i>
	M Madried access of built	,		Z Other information	

11 OTHER INCOME (LOSS)	
A* OTHER PORTFOLIO INCOME (LOSS)	20,124
C* SEC. 1256 CONTRACTS & STRADDLES	(6,844)
E CANCELLATION OF DEBT	1,338
F* OTHER INCOME (LOSS)	246,611
13 OTHER DEDUCTIONS	
A CASH CONTRIBUTIONS (50%)	~
H* INVESTMENT INTEREST EXPENSE	69,515
I DEDUCTIONS—ROYALTY INCOME	. 818
J SECTION 59(E)(2) EXPENDITURES	264
K* DEDUCTIONS—PORTFOLIO (2% FLOOR)	61,784
L DEDUCTIONS—PORTFOLIO (OTHER)	5
T* DOMESTIC PRODUCTION ACTIVITIES INFORMATION	SEE STATEMENT
16 FOREIGN TRANSACTIONS	
A NAME OF COUNTRY OR U.S. POSSESSION	VARIOUS
B* GROSS INCOME FROM ALL SOURCES	392,560
C* GROSS INCOME SOURCED AT PARTNER LEVEL	280,703
D* PASSIVE CATEGORY	36,651
E* GENERAL CATEGORY	656
G INTEREST EXPENSE	69,515
H OTHER	362,893
I* PASSIVE CATEGORY	3,613
J* GENERAL CATEGORY	824
L TOTAL FOREIGN TAXES PAID	857
M TOTAL FOREIGN TAXES ACCRUED	193
17 ALTERNATIVE MINIMUM TAX (AMT) ITEMS	
A POST-1986 DEPRECIATION ADJUSTMENT	27
B ADJUSTED GAIN OR LOSS	-
D OIL, GAS, & GEOTHERMAL—GROSS INCOME	583
E OIL, GAS, & GEOTHERMAL—DEDUCTIONS	97
F* OTHER AMT ITEMS	5
20 OTHER INFORMATION	
+	27.242
A INVESTMENT INCOME	35,843
B INVESTMENT EXPENSES	62,607
T* DEPLETION INFORMATION—OIL AND GAS	SEE STATEMENT
V* UNRELATED BUSINESS TAXABLE INCOME	SEE STATEMENT
Y* NET INVESTMENT INCOME	SEE STATEMENT
Z* OTHER INFORMATION	SEE STATEMENT

20,124

### PART II, ITEM L, CURRENT YEAR INCREASE (DECREASE) INCOME (LOSS) FROM SCH. K-1, BOXES 1 - 11 336,542 LESS: DEDUCTIONS FROM SCH. K-1, BOX 12, 13, 16L & 16M 133,436 taxable income TOTAL INCOME (LOSS) PER SCHEDULE K-1 203,106 UNREALIZED GAIN (LOSS) AND OTHER TEMPORARY ADJUSTMENTS (137,863)TAX-EXEMPT INTEREST INCOME 1,423 OTHER TAX-EXEMPT INCOME 2 NONDEDUCTIBLE EXPENSES (411)**GUARANTEED PAYMENT** TRANSFER/ASSIGNMENT OF PARTNERSHIP INTEREST TRANSFER/ASSIGNMENT OF PARTNERSHIP INTEREST CURRENT YEAR REDEMPTIONS PAYABLE PRIOR YEAR REDEMPTIONS PAYABLE REVERSAL CURRENT YEAR INCREASE (DECREASE) 66,257 **BOX 5 - INTEREST INCOME** U.S. GOVERNMENT INTEREST INCOME 3 OTHER INTEREST INCOME - FOREIGN 2,256 OTHER INTEREST INCOME - US 5,002 TOTAL INTEREST INCOME 7,261 **BOX 6, CODE A - ORDINARY DIVIDENDS** DIVIDEND INCOME - NONQUALIFIED - FOREIGN 1,836 DIVIDEND INCOME - NONQUALIFIED - US 695 QUALIFIED DIVIDENDS 5,450 TOTAL ORDINARY DIVIDENDS 7,981 BOX 6, CODE B - QUALIFIED DIVIDENDS DIVIDEND INCOME - QUALIFIED - FOREIGN 1,498 DIVIDEND INCOME - QUALIFIED - US 3,952 TOTAL QUALIFIED DIVIDENDS 5,450 BOX 11, CODE A - OTHER PORTFOLIO INCOME (LOSS) IRC SEC. 988 INCOME (LOSS) (FOREIGN CURRENCIES) Reclass to ordinary 7 11,319 (1040 FILERS ENTER ON SCH. E, PART II, INCOME - COL. J, (LOSS) - COL. H) IRC SEC. 987 INCOME (LOSS) (FOREIGN CURRENCIES) <sup>22</sup> (80) OTHER PORTFOLIO INCOME (LOSS) 8,885

TOTAL OTHER PORTFOLIO INCOME (LOSS)

HE FUND I L.P.	PARTNER # 84
----------------	--------------

THE CONTROL TUND I L.P.
SCHEDULE K-1 SUPPORTING SCHEDULES

BOX 11, CODE C - SECTION 1256 CONTRACTS & STRADDLES



OX 11, CODE C - SECTION 1230 CONTRACTS & STRADDLES	
NET SECTION 1256 GAIN (LOSS) FROM TRADING ACTIVITIES	(5,424
(1040 FILERS ENTER ON FORM 6781, LINE 1, GAIN COL. C (LOSS) COL. B)	
NET SECTION 1256 GAIN (LOSS) FROM INVESTMENT ACTIVITIES	(1,420
(1040 FILERS ENTER ON FORM 6781, LINE 1, GAIN COL. C (LOSS) COL. B)	
TOTAL SECTION 1256 CONTRACTS & STRADDLES	(6,844
DX 11, CODE F - OTHER INCOME (LOSS)	
NET ORDINARY INCOME FROM TRADE OR BUSINESS ACTIVITY BEFORE DIVIDEND INCOME	/ 39,529
(SEE SEPARATE FOOTNOTE BELOW FOR DETAILS)	
(1040 FILERS ENTER ON SCH. E, PART II, INCOME COL. J, (LOSS) COL. H)	
TOTAL ORDINARY TRADE OR BUSINESS DIVIDENDS	21,266
(1040 FILERS ENTER ON FORM 1040, LINE 9A) (SEE SUPPLEMENTAL FOOTNOTE)	
ORDINARY INCOME: SECURITIES TRADER MTM ELECTION PER I.R.C. SECTION 475 (F)	57,278
(1040 FILERS ENTER ON FORM 4797, PART II, LINE 10)	
TRADE OR BUSINESS CAPITAL GAINS (LOSSES):	
NET SHORT-TERM CAPITAL GAIN (LOSS)	39,734
(1040 FILERS ENTER ON SCH. D, LINE 5, COL. H)	
NET LONG-TERM CAPITAL GAIN (LOSS)	88,804
(1040 FILERS ENTER ON SCH. D, LINE 12, COL. H)	
TOTAL OTHER INCOME (LOSS)	246,611
DETAIL OF NET ORDINARY INCOME (LOSS) FROM TRADE OR BUSINESS ACTIVITY BEFORE	
DIVIDEND INCOME INCLUDED ON SCH. K-1, BOX 11, CODE F:	
U.S. GOVERNMENT INTEREST INCOME	13,084
OTHER INTEREST INCOME - FOREIGN	,20,652
OTHER INTEREST INCOME - US	40,158
FOREIGN CURRENCY GAIN (LOSS) § 988	30,110
OTHER TRADE OR BUSINESS EXPENSES	(56,018
OTHER ORDINARY INCOME (LOSS)	(8,457
TOTAL ORDINARY INCOME (LOSS)	39,529
SUPPLEMENTAL FOOTNOTE - DIVIDEND INCOME INCLUDED ON SCH. K-1, BOX 11, CODE F:	
DIVIDEND INCOME - QUALIFIED - FOREIGN	9.470
nos	3,479
DIVIDEND INCOME - QUALIFIED - US  (1040 FILERS ENTER TOTAL QUALIFIED DIVIDENDS ON FORM 1040, LINE 9B)	10,784
DIVIDEND INCOME - NONQUALIFIED - FOREIGN	2,27€
DIVIDEND INCOME - NONQUALIFIED - FOREIGN DIVIDEND INCOME - NONQUALIFIED - US	4,727
TOTAL ORDINARY TRADE OR BUSINESS DIVIDENDS	21,266
TO THE STUDIES IN TIME ON BOOMEDO DIVIDENDO	21,200
DX 13, CODE H - INVESTMENT INTEREST EXPENSE	
INVESTMENT INTEREST EXPENSE RELATED TO INVESTING ACTIVITIES	9,976
INVESTMENT INTEREST EXPENSE RELATED TO TRADING ACTIVITIES	59,539
TOTAL INVESTMENT INTEREST EXPENSE	69,515

THE COMPANY OF THE LAND I L.P.	PARTNER # 84	
SCHEDULE K-1 SUPPORTING SCHEDULES		
BOX 13, CODE K - DEDUCTIONS - PORTFOLIO (2% FLOOR)		
OTHER PORTFOLIO DEDUCTIONS		61,784
TOTAL DEDUCTIONS - PORTFOLIO (2% FLOOR)		61,784





PLEASE NOTE THAT WITH THE EXCEPTION OF LINES 1, 2, 10, 11E, 12, 13A AND THE INCOME (LOSS) LISTED IN THE "PASSIVE INCOME (LOSS) ITEMS", "SELF-CHARGED INTEREST" IN BOX 20Z, AND THE "PUBLICLY TRADED PARTNERSHIP INFORMATION" FOOTNOTES, NONE OF THE DISTRIBUTIVE SHARE ITEMS REPORTED ON SCHEDULE K-1 ARE CONSIDERED AS DERIVED FROM A PASSIVE ACTIVITY UNDER TREASURY REGULATION SECTION 1.469-1T(E)(6). See p. 10 for self-charged interest.

#### PASSIVE INCOME (LOSS) ITEMS:

THE FOLLOWING PASSIVE INCOME (LOSS) ITEMS ARE INCLUDED ON SCHEDULE K-1:

BOX 5	INTEREST INCOME	30
BOX 6A	ORDINARY DIVIDENDS	1
BOX 7	ROYALTIES	54
BOX 9	NET LONG-TERM CAPITAL GAIN (LOSS)	16
BOX 11A	OTHER PORTFOLIO INCOME (LOSS)	(15)
BOX 11F*	OTHER INCOME (LOSS)	(82)
BOX 13I	DEDUCTIONS - ROYALTY INCOME	-
BOX 13J	SECTION 59(E)(2) EXPENDITURES	259
BOX 13K	DEDUCTIONS - PORTFOLIO (2% FLOOR)	_
BOX 16L	TOTAL FOREIGN TAXES PAID	
BOX 16M	TOTAL FOREIGN TAXES ACCRUED	8

022.02

TREASURY REG. SEC. 1.469-2T(F)(4). AS DESCRIBED IN THE REG IS TREATED AS NON-PASSIVE TO THE EXTENT OF THE LESSER ( NET PASSIVE INCOME FROM THE ACTIVITY FOR SUCH TAX YEAR (Everything else is "trader" activity)

\*PLEASE NOTE: BOX 11F DOES NOT INCLUDE YOUR SHARE OF N Lines 1, 2, 10, 11E, 12, 13A and the income (loss) BUSINESS ACTIVITY, THE MTM LOAN ORIGINATION INCOME MAY listed in the "passive activity income (loss) items", self-THAT DO NOT MATERIALLY PARTICIPATE IN THE ACTIVITY. THER charged interest in box 20z and the PTP info footnote. INCOME OR LOSS FROM AN EQUITY-FINANCED LENDING ACTIVIT none of the distributive share of items are considered as derived from a passive activity per 1.469-1T(E)(6).

RESPECT TO THE APPLICATION OF THE PASSIVE ACTIVITY AND EFLA RULES

YOUR SHARE OF EQUITY-FINANCED INTEREST INCOME IS: YOUR SHARE OF NET PASSIVE INCOME FROM THIS ACTIVITY IS: 1,543

(1,913)

PLEASE NOTE THAT THE INVESTMENT INTEREST EXPENSE IN BOX 13, CODE H IS NOT INCLUDED IN BOX 11, CODE F AND SHOULD BE ENTERED ON FORM 4952.

INVESTMENT INCOME/EXPENSE ITEMS IN BOX 11, CODE C AND BOX 11, CODE F HAVE NOT BEEN INCLUDED IN BOX 20, CODE A AND BOX 20, CODE B. THESE AMOUNTS SHOULD BE CONSIDERED WHEN PREPARING FORM 4952. PLEASE CONSULT YOUR TAX ADVISOR.

#### BOX 13, CODE T: DOMESTIC PRODUCTION ACTIVITIES INFORMATION:

IN ADDITION TO THE INFORMATION PROVIDED ON SCHEDULE K-1, THE PARTNERSHIP PROVIDES THE FOLLOWING INFORMATION RELATING TO BOX 13, CODE T: EXCEPT FOR THE ITEMS LISTED IN THE "PUBLICLY TRADED PARTNERSHIP INFORMATION" FOOTNOTE, NONE OF THE PARTNERSHIP'S ITEMS RELATE TO DOMESTIC PRODUCTION ACTIVITIES. IF YOU OTHERWISE HAVE SECTION 199 ACTIVITIES, PLEASE NOTE THAT GROSS INCOME BEING REPORTED IN BOX 16, CODE B IS NET OF LOSSES FROM CAPITAL ASSETS. THIS AMOUNT ALSO REPRESENTS GROSS RECEIPTS. ADDITIONAL INFORMATION, IF NEEDED, IS AVAILABLE UPON REQUEST.

# GROSS INCOME FROM ALL SOURCES (BOX 16, CODE B) AND GROSS INCOME SOURCED AT THE PARTNER LEVEL (BOX 16, CODE C):

YOUR SHARE OF GROSS INCOME INCLUDES BOTH GAINS AND LOSSES. ADDITIONAL INFORMATION, IF NEEDED, IS AVAILABLE UPON REQUEST. PLEASE CONSULT YOUR TAX ADVISOR.



#### FOREIGN GROSS INCOME SOURCED AT PARTNERSHIP LEVEL, BOX 16, CODE D AND E:

FOREIGN QUALIFIED DIVIDENDS ARE INCLUDED IN BOX 16, CODE D AND E (AS WELL AS IN BOXES 6A AND 6B AND IN BOX 11, CODE F, IF APPLICABLE). PLEASE CONSULT YOUR TAX ADVISOR REGARDING WHETHER ADJUSTMENTS SHOULD BE MADE TO THIS AMOUNT OR ANY OTHER AMOUNTS APPEARING IN BOX 16 FOR PURPOSES OF CALCULATING YOUR FOREIGN TAX CREDITS ON FORM 1116.

YOUR ALLOCABLE SHARE OF FOREIGN QUALIFIED DIVIDENDS IS:

4,977

YOUR ALLOCABLE SHARE OF TOTAL FOREIGN DIVIDENDS IS:

9,089

#### DEDUCTIONS ATTRIBUTABLE TO FOREIGN SOURCE INCOME, BOX 16, CODE I AND J:

YOUR SHARE OF DEDUCTIONS AND LOSSES APPLICABLE TO FOREIGN SOURCE GROSS INCOME HAS BEEN CALCULATED USING THE GROSS INCOME METHOD AND IS REFLECTED IN BOX 16, CODE I AND J. THE GROSS INCOME METHOD HAS BEEN APPLIED TO INCLUDE BOTH GAINS AND LOSSES, AND, IN CERTAIN CIRCUMSTANCES, THE ABSOLUTE VALUE OF NET GAINS AND LOSSES HAVE BEEN USED. THIS AMOUNT SHOULD BE CONSIDERED FOR FOREIGN TAX CREDIT PURPOSES. THE PROPER TREATMENT OF THIS AMOUNT ON YOUR TAX RETURN DEPENDS UPON SEVERAL FACTORS INCLUDING WHETHER YOU ARE A CORPORATE OR NON-CORPORATE PARTNER, A GENERAL OR LIMITED PARTNER, AND YOUR PERCENTAGE INTEREST IN THE PARTNERSHIP. THE FOREIGN TAX CREDIT RULES ARE COMPLEX. PLEASE CONSULT YOUR TAX ADVISOR.

#### BOX 17, CODE F: OTHER AMT ITEMS:

EXCESS IDC FROM PASS-THROUGH INVESTMENTS	3
OTHER AMT ITEMS	2
TOTAL OTHER AMT ITEMS	5

BOX 20, CODE T; DEPLE	TION INFORMATION -	OIL AND GAS:

YOUR SHARE OF SUSTAINED-ASSUMED ALLOWABLE DEPLETION IS:

97

## BOX 20, CODE V: INFORMATION REGARDING UNRELATED BUSINESS TAXABLE INCOME:

YOUR SHARE OF ALL SCHEDULE K-1 ITEMS OF INCOME (LOSS) AND DEDUCTIONS OTHER THAN CAPITAL GAINS (LOSSES) AND SECTION 1256 GAINS (LOSSES) THAT IS CONSIDERED UNRELATED BUSINESS TAXABLE INCOME IS:

(16)

MA

YOUR SHARE OF SHORT-TERM CAPITAL GAINS (LOSSES) ON YOUR SCHEDULE K-1 THAT IS CONSIDERED UNRELATED BUSINESS TAXABLE INCOME IS:

4,692

YOUR SHARE OF LONG-TERM CAPITAL GAINS (LOSSES) ON YOUR SCHEDULE K-1 THAT IS CONSIDERED UNRELATED BUSINESS TAXABLE INCOME IS:

21,795

YOUR SHARE OF QUALIFIED DIVIDENDS INCLUDED IN ORDINARY INCOME (LOSS) SUBJECT TO UNRELATED BUSINESS TAXABLE INCOME IS:

1,787

### BOX 20, CODE Y: NET INVESTMENT INCOME TAX:

THE PARTNERSHIP IS A "FUND OF FUNDS", WHICH INVESTS, HOLDS AND SELLS INTERESTS IN VARIOUS TRADER AND INVESTOR FUND PARTNERSHIPS AND PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICS"). ALL OF THE DISTRIBUTIVE SHARE ITEMS REPORTED ON SCHEDULE K-1 ARE CONSIDERED NET INVESTMENT INCOME UNDER IRC § 1411(C)(2)(B). PLEASE CONSULT YOUR TAX ADVISOR WHEN COMPLETING FORM 8960.

THROUGHOUT THE YEAR, THE PARTNERSHIP HAS INVESTED, DIRECTLY AND INDIRECTLY, IN PASSIVE FOREIGN INVESTMENT COMPANIES (PFICS) FOR WHICH AN ELECTION UNDER §1.1411-10(G) WILL BE MADE. PLEASE CONSULT YOUR TAX ADVISOR.



#### BOX 20, CODE Z: OTHER INFORMATION:

FOR CORPORATE MEMBERS, THE FOLLOWING DIVIDENDS REPORTED ON SCHEDULE K-1 QUALIFY FOR THE DIVIDENDS RECEIVED DEDUCTION UNDER IRC SECTION 243:

14,630

NΑ

THE FOLLOWING AMOUNT INCLUDED ON BOX 11, CODE F REPRESENTS EXPENSES RELATED TO U.S. GOVERNMENT OBLIGATIONS:

122

THE FOLLOWING AMOUNT INCLUDED ON BOX 13, CODE H REPRESENTS INTEREST EXPENSE RELATED TO U.S. GOVERNMENT OBLIGATIONS:

11,471

THE FOLLOWING AMOUNT INCLUDED ON BOX 11, CODE F REPRESENTS SELF-CHARGED INTEREST INCOME.

SUBJECT TO THE RULES OF TREAS. REG. 1.469-7.

passive per p. 8

self-charged int

309 022.02

EFFECTIVELY CONNECTED INCOME ("ECI"):

YOUR SHARE OF ECI FROM PASS-THROUGH INVESTMENTS IS:

ORDINARY INCOME (LOSS)	(957)
NET SHORT-TERM CAPITAL GAIN (LOSS)	-
NET LONG-TERM CAPITAL GAIN (LOSS)	398
TOTAL ECI	(559)

### INFORMATION REGARDING TRANSFER OF PROPERTY TO FOREIGN CORPORATIONS:

THE FOLLOWING INFORMATION IS BEING PROVIDED FOR PURPOSES OF COMPLETING FORM 926. PLEASE CONSULT YOUR TAX ADVISOR TO DETERMINE WHETHER YOU ARE REQUIRED TO FILE FORM 926.

THE FOLLOWING INFORMATION APPLIES TO THE TRANSFERS LISTED BELOW:

LINE 10:

IRC §351 √

LINE 11-15:

NO 🇸

LINE 16:

YES 🧳

LINE 17(A):

NO 🏑

	4	COUNTRY	TRANSFER		•
TRANSFEREE FOREIGN CORPORATIO	CODE	DATE	AMOUNT	CFC	
WANY SERVED OF COMPONENT AND SPC	/	" CJ	/ VARIOUS	178,291	NO 🥖
**************************************	ERM TREASURY		used 12/31/15		
INVESTMENT SEGREGATED PORTFOL	.10 - OFFSHORE				
C/O MAPLES CORPORATE SERVICE LI	MITED				
CONTRACTOR AND RECORD SECTION	<del>SE POWM</del> √			and account of	
GRAND COMMUNICATION, SATURAL	<b>SEA</b> DS √		Filing required - > \$100k		
IDENTIFYING NUMBER	N/A		<u>I</u>		
FOREIGN LAW CHARACTERIZATION:	CORPORATION 🗸				
PRE-TRANSFER OWNERSHIP %:	<1% 🎻				
POST-TRANSFER OWNERSHIP %:	<1% 🦨				
3 Back Hills of Challet and Challet Ch	to a contract of the communication of the communication of the contract of the	and the second s	The second section of the second section of the second section of the second se	Museum market communities and house and the second	SOLITO PPP PROPRIENT CONTROL PARTIES CONTROL PROPRIENT STATE CONTROL STA
CGC OFFSHORE	UND LTD	CJ	VARIOUS	12	NO
COMPOSITION OF THE PROPERTY OF					
IDENTIFYING NUMBER:	N/A				
FOREIGN LAW CHARACTERIZATION:	CORPORATION				
PRE-TRANSFER OWNERSHIP %:	N/A				
POST-TRANSFER OWNERSHIP %:	N/A				



#### INFORMATION REGARDING TRANSFER OF PROPERTY TO FOREIGN CORPORATIONS CONTINUED:

THE FOLLOWING INFORMATION APPLIES TO THE TRANSFER LISTED BELOW:

LINE 10:

IRC §351

LINE 11-17(A):

NO

		COUNTRY	TRANSFER		
TRANSFEREE FOREIGN CORPORATIO	N INFORMATION	CODE	DATE	AMOUNT	
		CJ	VARIOUS	PROPERTY FMV	2,430
				PROPERTY COST	2,365
CRAND CAYMAN CAYMAN SHAREST	<del>71 56</del> 05				
IDENTIFYING NUMBER	N/A				
FOREIGN LAW CHARACTERIZATION:	CORPORATION				
TYPE OF PROPERTY TRANSFERRED:	SECURITIES				
CFC:	NO				
PRE-TRANSFER OWNERSHIP %:	<1%				
POST-TRANSFER OWNERSHIP %:	<1%				
OREDIO SCHOOL CONTINUENT, L.P.		CJ	7/16/2015	PROPERTY FMV	1,047
				PROPERTY COST	1,047
	<b>MANUS</b> S				
IDENTIFYING NUMBER:					
FOREIGN LAW CHARACTERIZATION:	EXEMPTED LIMITI	ED PARTNERSHIP		·	
TYPE OF PROPERTY TRANSFERRED:	PARTNERSHIP IN	TEREST			
CFC:	YES	•			
PRE-TRANSFER OWNERSHIP %:	<1%				
POST-TRANSFER OWNERSHIP %:	<1%				

PASSIVE FOREIGN INVESTMENT COMPANY INFORMATION - EXCESS DISTRIBUTION: 1291 funds with excess distributions - file 8621 THE PARTNERSHIP OWNS AN INDIRECT INTEREST, THROUGH UNDERLYING PARTNERSHIPS, IN PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICS") WHICH ARE TREATED AS SECTION 1291 FUNDS. THE AMOUNTS REPORTED BELOW ARE NEEDED FOR PREPARATION OF FORM 8621, RELATED TO DISTRIBUTIONS FROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND. THE AMOUNTS BELOW HAVE ALREADY BEEN INCLUDED ON YOUR SCHEDULE K-1.) For each 8621, "prevent inclusion on other Federal forms" MENTS.

since the items have already been included on the K-1.

CORPORATION PLC 🗸

YEAR: 7/1/2014 - 6/30/2015 🚀

PART I: SUMMARY OF ANNUAL INFORMATION COMMON STOCK V

1 SHARE CLASS DESCRIPTION: 2 DATE OF ACQUISITION\*:

12/10/2015

3 NUMBER OF SHARES HELD: 4 VALUE OF SHARES HELD:

N/A 🎻

5 PFIC TYPE:

SECTION 1291

5 AMOUNT:

PART II: ELECTIONS

LEAVE ITEMS A - H BLANK

### PART V: DISTRIBUTIONS FROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND

				LINE 15F	LINE 16A	LINE 16B	
	PFIC DISTRIBUTION	DATE	DATE	GAIN FROM	EXCESS	CURRENT YEAR &	
72	OR DISPOSITION	ACQUIRED*	SOLD	DISPOSITION	DISTRIBUTION	PRE-PFIC GAIN	
MANAGEM CO.	DISPOSITION	12/10/2015	12/10/2015	2	_	2	20000000
- 8	Province (1) I de la Company d	POLICE COMMUNICATION CONTRACTOR C	And representation problems in the Control of the C				. 3

\*IF YOU BECAME A PARTNER SUBSEQUENT TO THIS DATE, CONSIDER THE DATE YOU BECAME A PARTNER YOUR ACQUISITION DATE.



#### PASSIVE FOREIGN INVESTMENT COMPANY INFORMATION - DEEMED SALE ELECTION:

THE PARTNERSHIP OWNS AN INDIRECT INTEREST IN THE FOLLOWING PASSIVE FOREIGN INVESTMENT COMPANY ("PFIC") AND IS MAKING THE DEEMED SALE ELECTION UNDER SECTION 1291(D) WITH RESPECT TO THE PFIC. THE AMOUNTS REPORTED BELOW ARE NEEDED FOR PREPARATION OF FORM 8621 REGARDING THE DEEMED SALE OF SUCH PFIC SHARES ON JANUARY 1, 2015, YOUR SHARE OF EXCESS DISTRIBUTION REPORTED AS FORM 8621, LINE 16A BELOW HAS BEEN INCLUDED ON YOUR SCHEDULE K-10 PLEASE CONSULT YOUR TAX ADVISOR REGARDING THE FORM 8621 FILING REQUIREMENTS.

LOAN, LTD.

YEAR: 1/1/2015 - 12/31/2015

PART I: SUMMARY OF ANNUAL INFORMATION

1 SHARE CLASS DESCRIPTION:

2 DATE OF ACQUISITION:

3 NUMBER OF SHARES HELD:

4 VALUE OF SHARES HELD:

5 PFIC TYPE:

5 AMOUNT:

PARTII: ELECTIONS

**EQUITY** 

N/A

2 2,037

SECTION 1291

SELECTITEM D - "DEEMED SALE ELECTION"

## PART V: DISTRIBUTIONS FROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND

	DATE OF	LINE 15F	LINE 16A	LINE 16B
DATE	DEEMED	GAIN (LOSS)	EXCESS	CURRENT YEAR &
ACQUIRED	DISPOSITION	FROM DISPOSITION	DISTRIBUTION	PRE-PFIC GAIN
11/26/2014	1/1/2015	_		-



#### PUBLICLY TRADED PARTNERSHIP INFORMATION:

DURING 2015, THE PARTNERSHIP INDIRECTLY INVESTED IN PUBLICLY TRADED PARTNERSHIPS ("PTPS"). ALL INCOME (LOSS) ITEMS BELOW ARE INCLUDED IN YOUR SCHEDULE K-1.

ORDINARY INCOME, GAINS, LOSSES, AND DEDUCTIONS FROM A PTP ARE SUBJECT TO THE PASSIVE ACTIVITY LOSS LIMITATIONS. YOU ARE REQUIRED TO LIMIT THE RECOGNITION OF PASSIVE ACTIVITY LOSSES FROM A PTP TO THE AMOUNT OF PASSIVE ACTIVITY INCOME FROM THE SAME PTP. NET PASSIVE ACTIVITY INCOME FROM A PTP CANNOT BE USED TO OFFSET THE NET PASSIVE ACTIVITY LOSSES FROM OTHER SOURCES, INCLUDING OTHER PTPS. PASSIVE LOSSES WHICH ARE NOT RECOGNIZED CURRENTLY ARE SUSPENDED AND CARRIED FORWARD UNTIL YOU ARE EITHER ALLOCATED NET PASSIVE INCOME FROM THE SAME PTP TO WHICH THE SUSPENDED LOSSES CAN BE OFFSET, OR IF YOU DISPOSE OF THE ENTIRE INTEREST IN THE PTP, AT WHICH TIME THE SUSPENDED LOSSES ARE FULLY RECOGNIZED. PLEASE CONSULT YOUR TAX ADVISOR.

	rting due to materiality		DADTHEDALO	
		ARTNERS LP*	PARTNERS LP	
		EIN: @ERANGER	EIN: <b>(244)</b>	PARTNERS LP
BOX 1	ORDINARY BUSINESS INCOME (LOSS)	-	-	(
BOX 5	INTEREST INCOME	-	_	
BOX 8	NET SHORT-TERM CAPITAL GAIN (LOSS)	- ]	5	
BOX 10	NET SECTION 1231 GAIN (LOSS)	-	-	
BOX 11F	OTHER INCOME (LOSS)	-	-	
BOX 13A	CASH CONTRIBUTIONS (50%)	-	-	
		LUPUR 1 " UIL KELATEU -		
BOX 13T	DOMESTIC PRODUCTION GROSS RECEIPTS	<u>`                                      </u>		
BOX 13T	COST OF GOODS SOLD ALLOCABLE TO DPG	<u>`                                      </u>		
BOX 13T		R		
BOX 13T BOX 13T	COST OF GOODS SOLD ALLOCABLE TO DPG	R R - OIL RELATED		
	COST OF GOODS SOLD ALLOCABLE TO DPG COST OF GOODS SOLD ALLOCABLE TO DPG	R R - OIL RELATED GR		
BOX 13T BOX 13T BOX 13T BOX 13T	COST OF GOODS SOLD ALLOCABLE TO DPG COST OF GOODS SOLD ALLOCABLE TO DPG DEDUCTIONS DIRECTLY ALLOCABLE TO DPG DEDUCTIONS DIRECTLY ALLOCABLE TO DPG	R R - OIL RELATED GR		
BOX 13T BOX 13T BOX 13T BOX 13T	COST OF GOODS SOLD ALLOCABLE TO DPG COST OF GOODS SOLD ALLOCABLE TO DPG DEDUCTIONS DIRECTLY ALLOCABLE TO DPG	R R - OIL RELATED GR		
BOX 13T BOX 13T BOX 13T BOX 13T	COST OF GOODS SOLD ALLOCABLE TO DPG COST OF GOODS SOLD ALLOCABLE TO DPG DEDUCTIONS DIRECTLY ALLOCABLE TO DPG DEDUCTIONS DIRECTLY ALLOCABLE TO DPG  MINIMUM TAX ITEMS	R R - OIL RELATED GR		
BOX 13T BOX 13T BOX 13T BOX 13T	COST OF GOODS SOLD ALLOCABLE TO DPG COST OF GOODS SOLD ALLOCABLE TO DPG DEDUCTIONS DIRECTLY ALLOCABLE TO DPG DEDUCTIONS DIRECTLY ALLOCABLE TO DPG  MINIMUM TAX ITEMS POST-1986 DEPRECIATION ADJUSTMENT	R R - OIL RELATED GR		
BOX 13T BOX 13T BOX 13T BOX 13T ALTERNATIVE BOX 17A	COST OF GOODS SOLD ALLOCABLE TO DPG COST OF GOODS SOLD ALLOCABLE TO DPG DEDUCTIONS DIRECTLY ALLOCABLE TO DPG DEDUCTIONS DIRECTLY ALLOCABLE TO DPG  MINIMUM TAX ITEMS POST-1986 DEPRECIATION ADJUSTMENT	R R - OIL RELATED GR		

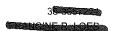




### **STATE INFORMATION:**

THE PARTNERSHIP INVESTS IN PARTNERSHIPS WHICH GENERATE INCOME SOURCED TO VARIOUS STATES AND JURISDICTIONS. THE AMOUNTS BELOW REPRESENT YOUR ALLOCABLE SHARE OF STATE SOURCED INCOME (LOSS). PLEASE CONSULT YOUR TAX ADVISOR.

	SOURCED	TAXE\$ PAID		TENTATIVE	BOX 18A	BOX 18C
	INCOME	ON YOUR	INTANGIBLE	ALLOWABLE	TAX-EXEMPT	NONDEDUCTIBLE
STATE	(LOSS)	BEHALF	DRILLING COSTS*	DEPLETION*	INTEREST INCOME	EXPENSES
ALABAMA	3	-		-	45	5
ARIZONA	(31)	-		м	21	2
ARKANSAS	_	_		-	26	3
COLORADO	(22)	_		-	15	2
DELAWARE	_	-		-	6	_
DISTRICT OF COLUMBIA	_	_	-	-	-	
FLORIDA	(140)	-		-	37	4
GEORGIA	(242)	-	-		41	5
HAWAII	_	-	_	_	21	2
IDAHO	(303)	-	-	٠	8	1
ILLINOIS	(68)	-	-		1	<u>u</u>
INDIANA ·	2	-	-	-	_	_
KANSAS	_	-	-	-	34	4
KENTUCKY	1	-	-		12	1
LOUISIANA	(66)	-	-	-	18	2
MAINE	_	-	-	_	1	-
MARYLAND	1	-	-	· -	19	2
MASSACHUSETTS	(3)	-	-	-	19	3
MICHIGAN	(12)	-	-	-	25	2
MINNESOTA	33		-	-	58	8
MISSISSIPPI	86	4	-	-	21	3
MISSOURI	6		-	_	32	4
MONTANA	18	1	-	-	2	-
NEBRASKA		_		-	23	3
NEVADA	16	-	-	-	-	-
NEW HAMPSHIRE	-	_	-	-	4	. 1
NEW MEXICO	_	_		-	6	1
NORTH CAROLINA	(1)	_	-	-	16	2
OHIO	(10)	1	-	-	30	4
OKLAHOMA	6	_	_	_	4	
OREGON	26	-	-	-	25	3
PENNSYLVANIA	(25)	-	-	-	32	4
RHODE ISLAND	(9)	-	-		-	
SOUTH CAROLINA		-	-	-	74	9
SOUTH DAKOTA		-	-	-	-	-
TENNESSEE		-	<del>-</del>	-	19	2
TEXAS	(204)	-	3	2	71	9
UTAH	(36)	_	-		8	1



### STATE INFORMATION CONTINUED:

STATE	SOURCED INCOME (LOSS)	TAXES PAID ON YOUR BEHALF	INTANGIBLE DRILLING COSTS*	TENTATIVE ALLOWABLE DEPLETION*	BOX 18A TAX-EXEMPT INTEREST INCOME	BOX 18C NONDEDUCTIBLE EXPENSES
VERMONT	-	-	-	-	4	1
VIRGINIA	(38)	-	-	-	57	8
WASHINGTON	-	-		-	1	-
WEST VIRGINIA	(1)	-		_	10	1
WISCONSIN	(2)	-		-	-	ш.
PUERTO RICO	_	-	-	-	456	17
GUAM	-	-		-	-	-

<sup>\*</sup>INTANGIBLE DRILLING COSTS AND DEPLETION ARE NOT INCLUDED IN THE SOURCED INCOME (LOSS) COLUMN

IN ADDITION TO THE ABOVE STATE SOURCED INCOME, YOUR SHARE OF THE PARTNERSHIP'S NEW YORK CITY SOURCED INCOME (LOSS) IS:

NEW YORK CITY SOURCED INCOME (LOSS):

(2)

FOR ILLINOIS INCOME TAX PURPOSES, THE PARTNERSHIP IS AN INVESTMENT PARTNERSHIP AS DEFINED UNDER SECTION 1501(a)(11.5) OF THE ILLINOIS INCOME TAX ACT.

	The Fund I	. LP			ine 1	Portfolio Line 11A	Lin
Per na		, =- tes, all income is nonpassive except 1,2,10,11e,1:	2 13a and the	Passive	Nonpassive	Nonpassive	Passive
i oi pe	info from	Passive Detail, PTP Detail, and 20Z Self-Charged	Int.			11111	
			·				
021K.15	Line 1	Ordinary Income	(487)	(487)			(82)
		Ord. Income-PFIC on Form 8621					
		Section 987 Gain/(Loss)		····		(80)	
		Section 988 Gain/(Loss)				11,319	
		Section 475 Gain/(Loss)		···			
		Section 475 Gain/(Loss)-PFIC on Form 8621					
		Swan Income					
		Investment Interest Expense-Sch. E					
		Amortization on Bond Premium					
		Section 751 Gain/(Loss)					
		Trade or Business Expenses					
	Line 2	Rental R/E Income	(221)				
	Line 3	Other Rental Income	····				
	Line 4	Guaranteed Payments					
	Line 5	Interest Income	7,258	İ			
		Government Obligations	3	İ			
	Line 6a	Ordinary Dividends	7,981				
	Line 6b	Qualified Dividends	5,450				
	Line 7	Royalties	477				
	Line 8	STCG	12,777				
	Line 9a	LTCG	47,464	:			
		LTCG-PFIC on Form 8621		:		:	
	Line 9b	Collectibles		•			
	Line 9c	Unrecap 1250 Gain 1231 Gain	24				
	Line 10	1231 Gain	61				
	Line 11a	Other Portfolio Income	20,124	Î		8,885	
	Line 11b	Involuntary Conversions					
	Line 11c	§ 1256 contracts & straddles	(6,844)				
	Line 11e	cancellation of debt	1,338				
	Line 11f	Other Income	246,611				

9 11f		er K-1 Items		ALS							
Nonpassive	Passive	Nonpassive	Passive	Nonpassive							
			Ent #23	Ent #28							
(8,375)		-	(569)	(8,375)		K-2 Act	ivity				
			-	-							
				(80)	(	2)	Ordina	ry Gain			
30,110			-	41,429	L		<b>7</b> 2	98,627	K-2	 <u>:</u>	<u>.</u>
57,278			-	57,278	ı.İ.					 <u> </u>	<u> </u>
			-	-	<u></u>					<u>.</u>	
			-	-		<b>↓</b>					
			-	-							
			_	-						 	
			-	-	L.İ.						
(56,018)			-	(56,018)		K-5 Oth	er Incom	ie & Adj.			
	(221)		(221)	-		K-2					
		-	-	-							
			-	-	L.İ.						
60,810	339	6,919	339	67,729							
13,084		3	-	13,087	ı.İ.					 <u> </u>	
21,266	1	7,980	1	29,246	<u></u>						
14,263		5,450	-	19,713	L.İ.						
	54	423 12,777	54	423	ı.İ.						
39,734			-	52,511	L.İ.						
88,804	16	47,448	16	136,252	L.İ.						
			_	-							
		-	_	-							
	24		24	-							
	61		61	- ]							
	(15)		(15)	8,900							
		-		-							
		(6,844)	-	(6,844)							
	1,338		1,338	-							
			-	-	ï					:	

	-						-		
 		\$						<b></b>	
 		j						j	
 		ļ		 				ļ	
		: :						: :	
		ļ						ļ	
		•		 			•	•	
 			······		· · · · · · · · · · · · · · · · · · ·	}			
 		 :		 				 :	
 		: :		 				: :	
							<u></u>		

					Portfolio	
The Fun	d I, LP		L	ine 1	Line 11A	L
Per partner foot	notes, all income is nonpassive except 1,2,10,11e,12	2,13a, and the	Passive	Nonpassive	Nonpassive	Passive
info fro	m Passive Detail, PTP Detail, and 20Z Self-Charged	Int.				
Line 12	Section 179 Deduction					
Line 13a						
Line 13h		9,976				
	Investment Interest Exp Sch. E	59,539				
Line 13i	Deduction - Royalty Expense	818				
Line 13j	§59 (e)(2) expenditures	264				
Line 13k	Deductions - Portfolio (2% Floor)	61,784				
Line 13I	Deductions - Portfolio (Other)	5				
Line 13t	Domestic Production Gross Receipts (DPGR)					
Line 13t	Gross Receipts from All Sources					
Line 13t	Cost of Goods Sold Allocable to DPGR					
Line 13t	Cost of Goods Sold From All Sources					
Line 13t	Deductions Allocable to DPGR					:
Line 13t	Deductions Allocable to Non-DPGR		:			:
Line 13t			:			
Line 13t	W-2 Wages					
Line 13w	Other Deductions					
Line 15o	Federal Withholding					
Line 15m	Credit for increasing research activities					
Line 15n						
Line 15p	Other credits					
Line 16b		392,550				
Line 16c		280,703				
Line 16d	Foreign-Passive income	36,651				
Line 16e	Foreign-General Limitation income	656				:
Line 16f	Foreign-Other income					:
Line 16g	Foreign-Interest Expense	69,515	:			:
Line 16h		362,893				
Line 16i	Foreign-Passive deductions	3,613				
Line 16j	Foreign-General Limitation deductions	824				
Line 16k		····				<b>*************************************</b>

		er K-1 Items	TOT	ALS		
Nonpassive	Passive		Passive	Nonpassive		
-			Ent #23	Ent #28		
			-	-		
	-		-	-		
	9,976		9,976	-		
		59,539	-	59,539		
		818	-	818		
	259	5	259	5	K-3 Activity (continued)	
		5 61,784	- ]	5 61,784	K-2	
		5	-	5		
		-	-	_		
			-	_		
			-	_		
				-		
		392,550	-	392,550	K-3	
		280,703	- 1	<b>1A</b> 280,703		
		36,651	-	36,651		
		656	- 3	<b>¹A</b> 656		
		- I		NA -		
		69,515		69,515 40 362,893		
		362,893		<b>1</b> 362,893		
		3,613	-	3,613		
		824		<b>\A</b> 824		
		-	-			

					-	
 	 	 	 )			 
	 	 	 }			
	 	 	 }	·····		 
 	 	 	 ,			 
			<u> </u>			

						Portfolio	
The	e Fund I,	LP		L	ine 1	Line 11A	Lir
Per partner	r footnot	tes, all income is nonpassive except 1,2,10,11	e,12,13a, and the	Passive	Nonpassive	Nonpassive	Passive
in	fo from l	Passive Detail, PTP Detail, and 20Z Self-Charg	jed Int.				
Lin <sub>'</sub>	e 16l	Foreign Taxes Paid	857				
Lin	e 16m	Foreign Taxes Accrued	193				
Lin <sub>'</sub>	e 17a	AMT Adjustment	27				
Lin <sub>'</sub>	e 17b	AMT Adjusted Gain/Loss					
Lin <sub>'</sub>	e 17c	Depletion					
Lin <sub>'</sub>	e 17d	Oil, gas, & geothermal - gross income	583				
Lin <sub>'</sub>	e 17e e 17f	Oil, gas, & geothermal - deductions	97				
Lin-	e 17f	Other AMT Items	5				
Lin <sub>'</sub>	e 18a	T/E Interest Income	1,423				
Lin <sub>'</sub>	e 18b	Other tax-exempt income	2				
Lin <sub>'</sub>	e 18c	Nondeductible Expenses	411				
	e 20a	Investment Income	35,843				
Lin	e 20b	Investment Expenses	62,607				
Lin	e 20v	Unrelated business Taxable Income					
				(487)	-	20,124	(82)
				-		-	
		Income/Loss from Lines 1-11	336,542				
		Income/Loss from Lines 1-11 Deductions from Lines 12, 13, 16L, 16M	(133,436)				
		Income per K-1	203,106				
		Book to tax differences	(136,849)				
Ser	ction L	Current Year Increase (Decrease)	66,257				
				<b></b>	······		(·····································
					·····		6 : :
ļi.				ķ	·····•		ķ

					•			:		:
·	All Othe	er K-1 Items	ТОТ	ALS	·· †					
Nonpassive	Passive	Nonpassive	Passive	Nonpassive					······································	······································
			Ent #23	Ent #28	<del>-</del>		; :	·		
		857	-	857						
	-	193	-	193	<b>+</b>				:	:
		27	-	27	K-2	:	:	:	:	:
		-	-	-						
		-	-	-						
		583	-	583						
		97		97						
		5	-	<b>/</b> 51						
		1,423	-	1,423						
		2	-	2						
		411	-	411						
		35,843	-	35,843					<u>.</u>	
		62,607	-	62,607			<u> </u>		<u>:</u>	<u>.</u>
		-	-	-	<u> </u>					
246,693 -	(8,662)	(54,495)		335,538					<u>.</u>	<u>.</u>
-			10,235	123,201						
	<u> </u>								<u>:</u>	<u>.</u>
									<u> </u>	
		Income	allocated on K-1	203,106					<u>.</u>	<u>.</u>
							<u> </u>	<u> </u>	<u>.</u>	<u>.</u>
				-					<u>;</u>	<u>.</u>
									<u> </u>	<u> </u>
							ļ			
							<u>:</u>			<u>:</u>
										-

					•		
	 		 	 	 )	}	:
							<del>                                     </del>
			 	 	 		<u>.</u>
	 		 	 	 		<u> </u>
	 		 	 	 		·
	 		 	 	 		<b></b>
							ļ
					 		<u>.</u>
							<u> </u>
			 	 	 		····
	 		 	 	 		}
			 		 		<u></u>
	 		 	 	 		<u> </u>
					 		<u>.</u>
		-		 			<u> </u>
							[ ]
<u> </u>							

								Portfolio		
	The Fund I,					ine 1		Line 11A		Lin
Per pai	rtner footnot	es, all income is nonpassive except 1,2,10,11e,12 Passive Detail, PTP Detail, and 20Z Self-Charged	2,13a, and the		Passive	Nonpassive		Nonpassive		Passive
	info from l	Passive Detail, PTP Detail, and 20Z Self-Charged	Int.							
							П		П	
							П		ΙŢ	
							"			
							М			
				-			Н			
				·			H			
							H			
							H		∔.	
			<u></u>				Н			
							١,			
									↓.	
			<u>!</u>				Ш		Ш.	
							Ш		<u></u> .	
							M			
							Π		Ĩ	
							П		Ī	
									· · ·	
					• • • • • • • • • • • • • • • • • • • •		"			
							"		••••	
							H		••••	
			···· <u>i</u>				H		••	
							H			
				·			ıj			
				. <b>.</b>			H		∔-	
			<u> </u>				H		∔.	
							ļļ			
				ļ			įj		<b>.</b> į.	
			•				: :		: :	

	All Oth	er K-1 Items	1	TO	TALS	i-i	•••••••••••				
Namaaaina						<b>∐</b>		 		ļ	
Nonpassive	Passive	Nonpassive	$\perp \perp$	Passive	Nonpassive	Li		 		<u>.</u>	
				Ent #23	Ent #28	Ц					
						: ::::::::::::::::::::::::::::::::::::					
						}! ! !		 	<b>3</b>	• :	
						<del>  </del> -				<u>:</u>	
						<b></b>		 			
			ļ			ļļ		 			
						ļļ		 		ļ	
						<u>                                     </u>				<u></u>	
						<u> </u>					
						) · (· · · · · · · · · · · · · · · · · ·		 		\$	
										j	
						<u></u>		 			
						<b></b>		 		<u>.</u>	
						ļļ		 		ļ	
						ļļ		 			
						<u> </u>		 		<u> </u>	
							<u>i</u>				
						}! !					
						<u> </u>		 			
			•			<u> </u>	···········	 	<u> </u>	i	
						<b></b>		 			
						ļļ		 			
						ļļ		 		ļ	
						<u> </u>					
										<u> </u>	
					:	[ ]				:	

		-		=			
						;	
	 		 	·····	 	•	
	 		 	}	 	,	
						 !	
						<u> </u>	
				}			
 	 		 		 	: :	
 	 		 		 	ļ	
				,			
			 	;	 	} : :	
 	 		 		 	: 	

				Portfolio	
The Fund I, LP		 L	ine 1	Line 11A	Lin
Per partner footnotes, all income is nonpassive except 1,2,10,11e,12,13	Ba, and the	Passive	Nonpassive	Nonpassive	Passive
info from Passive Detail, PTP Detail, and 20Z Self-Charged Int.	,				

	All Other K-1 Items		TOTALS						
Nonpassive	Passive	Nonpassive		Passive	Nonpassive				
				Ent #23	Ent #28				

					<b>↓</b>