

2014 Income Tax Returns

AMERICAN JEWISH COMMITTEE

Instructions for filing AMERICAN JEWISH COMMITTEE Form 990T - Exempt Organization Business Return for the period ended December 31, 2014

Signature...

The original return should be signed (using full name and title) and dated on page 2 by an authorized officer of the organization.

Filing...

The signed return should be filed on or before November 16, 2015 with...

Department of the Treasury
Internal Revenue Service Center
Ogden, UT 84201-0027

Payment of tax...

No payment of tax is required.

To document the timely filing of your tax return(s), we suggest that you obtain and retain proof of mailing. Proof of mailing can be accomplished by sending the tax return(s) by registered or certified mail (metered by the U.S. Postal Service) or through the use of an IRS approved delivery method provided by an IRS designated private delivery service.

Form **990-T**

Exempt Organization Business Income Tax Return

Form JJU I		(and proxy tax							O 4 =	
	For cale	ndar year 2014 or other tax year begin	ning _	-01/01, 2014, a	and endi	ng12/31_, 20	0_14	2	(0) 14	
Department of the Treasury		formation about Form 990-T and						Open to P	Public Inspection for	
Internal Revenue Service Check box if	▶ Do	not enter SSN numbers on this form		-		i			Public Inspection for Organizations Only cation number	
address changed		Name of organization (Check be	ux II IIai	me changed and see ir	istruction	5.)			ee instructions.)	
B Exempt under section		AMERICAN JEWISH COM	мттт	rr						
X 501(C)(3)	Print	Number, street, and room or suite no. I					13-5563393			
408(e) 220(e)	or			,			E Unrelated business activity codes			
408A 530(a)	i ype	165 EAST 56TH STREE	Г				(See in	structions.)		
529(a)		City or town, state or province, country		ZIP or foreign postal co	de					
C Book value of all assets		NEW YORK, NY 10022-	2709				52599	90		
at end of year	F Gro	up exemption number (See instruct	ions.)	>		<u>.</u>				
164,079,450.	G Che	ck organization type X 501	(c) coi	rporation	501(c) trust	401(a)	trust	Other trust	
H Describe the organize	zation's p	rimary unrelated business activity.	► IN	VESTMENT IN	LIMI'	TED PARTNER	RSHIPS	3		
I During the tax year,	was the	corporation a subsidiary in an affili	iated g	roup or a parent-sub	sidiary o	controlled group?		▶∟	Yes X No	
		identifying number of the parent co	•							
		DANIEL GOLDWATER CON'	TROL	LER T	elephon	ne number ► 21	12-891	L-1473		
		or Business Income		(A) Income	!	(B) Expens	ses		(C) Net	
1a Gross receipts or s										
b Less returns and allowa		c Balance ▶								
		ule A, line 7)	2							
		2 from line 1c ttach Schedule D)	3 4a	10	832.				10,832.	
		Part II, line 17) (attach Form 4797)	4a 4b	10,	552.				10,032.	
		rusts	4c							
		os and S corporations (attach statement)		36,	546.	ATCH 1			36,646.	
			6			711011 1				
		come (Schedule E)	7							
		nts from controlled organizations (Schedule F)	8							
		1(c)(7), (9), or (17) organization (Schedule G)								
10 Exploited exempt	activity in	ncome (Schedule I)	10							
11 Advertising incom	ne (Sched	lule J)	11							
12 Other income (Se	ee instruc	tions; attach schedule)	12							
		ough 12	13		478.				47,478.	
		Taken Elsewhere (See insti				, ,	xcept f	or contri	butions,	
		be directly connected with t		related busines	ss inco	me.)				
•	•	directors, and trustees (Schedule K)					14			
									1,831.	
		See instructions for limitation rules)							·	
		4562)		1	1					
		on Schedule A and elsewhere on re					22b			
23 Depletion							. 23			
24 Contributions to o	deferred	compensation plans					. 24			
		8								
		Schedule I)								
		chedule J)							4 000	
		schedule)							4,800.	
		s 14 through 28						-	6,631.	
		le income before net operating							40,847.	
		on (limited to the amount on line 30 e income before specific deduction					. 31		40,04/.	
		ally \$1,000, but see line 33 instruc							1,000.	
		ble income. Subtract line 33 fr							_,	
enter the smaller			, III	30	- 5.00		´ 34		0	

OMB No. 1545-0687

Form **8868**

(Rev. January 2014)

Department of the Treasury

Application for Extension of Time To File an Exempt Organization Return

► File a separate application for each return.
mation about Form 8868 and its instructions is at www.irs.αov/form8868.

OMB No. 1545-1709

Internal Revenue	e Service Information about Form 88	868 and its i	nstructions is at www.irs.	.gov/rorm8868.				
If you are	filing for an Automatic 3-Month Extension,	complete c	only Part I and check th	nis box				
If you are	filing for an Additional (Not Automatic) 3-Me	onth Exten	sion, complete only Pa	art II (on page 2 of this f	orm).		
Do not comp	olete Part II unless you have already been gra	nted an au	tomatic 3-month extens	sion on a previously filed	d Fo	rm 886	38.	
a corporation 8868 to req Return for	ling (e-file). You can electronically file Form n required to file Form 990-T), or an addition uest an extension of time to file any of the Transfers Associated With Certain Personal. For more details on the electronic filing of the	nal (not au forms liste al Benefit (tomatic) 3-month exter ed in Part I or Part II w Contracts, which mus	nsion of time. You can exith the exception of Fo t be sent to the IRS	elect rm in p	tronica 8870, paper	ally file Form Information format (see	
Part I Au	tomatic 3-Month Extension of Time. Or	nly submit	original (no copies no	eeded).			-	
	n required to file Form 990-T and requesting			· · · · · · · · · · · · · · · · · · ·	nple	te		
Part I only		·					▶ X	
All other cor	porations (including 1120-C filers), partnersh	hips, REMIC	Cs, and trusts must use	Form 7004 to request an	exte	ension	of time	
to file incom	e tax returns.			Enter filer's identifyir	ng nu	mber, s	ee instructions	
T	Name of exempt organization or other filer, see in	nstructions.		Employer identification nu	ımbe	r (EIN)	or	
Type or								
print	AMERICAN JEWISH COMMITTEE			13-556339	3			
File by the due date for Number, street, and room or suite no. If a P.O. box, see instructions. Social security number, street, and room or suite no. If a P.O. box, see instructions.				Social security number (S	SN)			
filing your	165 EAST 56TH STREET							
return. See instructions.	City, town or post office, state, and ZIP code. For	r a foreign ad	dress, see instructions.					
	NEW YORK, NY 10022-2709							
Enter the Re	eturn code for the return that this application	is for (file a	a separate application fo	or each return)			0 7	
Application		Return	Application				Return	
Is For		Code	Is For				Code	
	Form 990-EZ	01	Form 990-T (corporat	tion)			07	
Form 990-BL		02	Form 1041-A	lion)			08	
Form 4720 (03		n individual)			09	
Form 990-PF	,	04	Form 5227	,				
	(sec. 401(a) or 408(a) trust)	05	Form 6069				11	
	(trust other than above)	06	Form 8870				12	
	s are in the care of ▶DANIEL_GOLDWATER				_ <u>Y</u> _)RK,	NY 10022	
	e No. ►212_891-1473		FAX No. ►212_75					
	anization does not have an office or place of						▶ 📖	
	or a Group Return, enter the organization's fo	_				_	his is	
	e group, check this box		art of the group, check t	this box ▶ [and at	itach	
	e names and EINs of all members the extens		and and the Classic Control) T)(
	st an automatic 3-month (6 months for a co	-	Territoria de la companya della companya della companya de la companya della comp		h 0) (0	The	autonaian ia	
	$\underline{11/16}$, 20 $\underline{15}$, to file the organization's return for:	exempt or	janization return for the	e organization nameu a	DOVE	;. ITIE	extension is	
	calendar year 20 <u>14</u> or							
	tax year beginning	20	and anding		20			
	tax year beginning	, 20	, and ending	'	20_	· – – ·		
	ax year entered in line 1 is for less than 12 m	nonths, ched	ck reason: Initial r	eturn Final retur	n			
	application is for Form 990-BL, 990-PF, 99	90-T, 4720	, or 6069, enter the	tentative tax, less any				
	undable credits. See instructions.			,	За	\$	0	
	application is for Form 990-PF, 990-T,	4720, or	6069, enter any re	efundable credits and				
	ted tax payments made. Include any prior yea		-		3b	\$	0	
	e due. Subtract line 3b from line 3a. Include							
	onic Federal Tax Payment System). See instru				3с		0	
Caution. If you	u are going to make an electronic funds withdrawa	al (direct deb	it) with this Form 8868, se	ee Form 8453-EO and Forn	n 88	79-EO f	for payment	
instructions.								

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

Form **8868** (Rev. 1-2014)

Part III Tax Computation

	13-	5563393	ı	Page 2
)				
	25-			
>	35c			
n				
▶	36			
>	37			
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	39			
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	43			0
_	45			
-	45			
_	46			
>	47			
>	48			
<u> </u>	49			
ons	s)			
rity	over	a financial	Yes	No
		of Foreign		
		-	Х	
rei	gn trus	st?		X
	J			
	_			
	6			
Э				
1				
	7			
(wi	th re	espect to	Yes	No
		le) apply		

35	_	zations Taxable as Corporati			ation. Controlled g	roup			
	membe	rs (sections 1561 and 1563) check h	here 🕨 🔙 See inst	tructions and:					
а	1 -	our share of the \$50,000, \$25,000	0, and \$9,925,000 t		cets (in that order):				
	(1) \$	(2)		(3)					
b	Enter o	rganization's share of: (1) Additional 5%	% tax (not more than \$	311,750)	\$				
	(2) Addi	tional 3% tax (not more than \$100,00	00)		\$				
		tax on the amount on line 34					5c		—
36	Trusts		See instructions	•					
		ount on line 34 from: Tax rate so					6		—
37	-	ax. See instructions					7		—
38 39		tive minimum tax dd lines 37 and 38 to line 35c or 36,					8		—
_		Tax and Payments	willcriever applies			<u> 3</u>	9		—
			4440, trusto ottook For	1116) <u>10</u>	12				—
		tax credit (corporations attach Form							
		redits (see instructions)							
		l business credit. Attach Form 3800 (s or prior year minimum tax (attach For							
		redits. Add lines 40a through 40d					0e		
41		et line 40e from line 39					1		—
42		xes. Check if from: Form 4255					2		_
43		x. Add lines 41 and 42	_			· · · —	3		
		nts: A 2013 overpayment credited to 2		1	1	•••			_
		stimated tax payments							
C		osited with Form 8868							
		organizations: Tax paid or withheld at			ld				
		withholding (see instructions)			le				
f		or small employer health insurance pr			lf				
g	Other c	redits and payments:	Form 2439						
	F	orm 4136	Other	Total ▶ 44	łg 💮				
45	Total pa	ayments. Add lines 44a through 44g .				4	.5		
46	Estimat	ed tax penalty (see instructions). Chec	ck if Form 2220 is attac	hed		4	6		
47	Tax due	. If line 45 is less than the total of lin	es 43 and 46, enter am	nount owed		▶ 4	7		_
48		yment. If line 45 is larger than the tot				▶ 4	8		_
49		e amount of line 48 you want: Credited to			Refunde		.9		_
Par		Statements Regarding Ce			· ·			T., T.,	_
1	•	time during the 2014 calendar year, o	· ·		· ·	•		Yes No	<u> </u>
		(bank, securities, or other) in a foreig	•	•		114, Rep	ort of Foreign		
_		d Financial Accounts. If YES, enter the						X	—
2		the tax year, did the organization rece			r of, or transferor to,	a foreign	trust?	X	_
•	•	see instructions for other forms the org	•		2 170				
3 Sob		ne amount of tax-exempt interest rece			2,178.				_
		A - Cost of Goods Sold. Ent	ter method of invent		d of voor		6		—
1 2		ry at beginning of year 1 2			d of year ds sold. Subtract		3		—
3	Purchas			_	5. Enter here and				
_		labor 3 al section 263A costs			o. Enter here and		7		
4 a		schedule) 4a			of section 263			Yes No	_
h		osts (attach schedule) 4b			uced or acquired	`		100 110	
5		dd lines 1 through 4b 5			ion?		, , ,	Х	
		nder penalties of perjury, I declare that I have e	examined this return, includi	ng accompanying schedules	and statements, and to the	he best of r	ny knowledge and		
Sigi	l cc	prrect, and complete. Declaration of preparer (other	r than taxpayer) is based on al	I information of which prepar	rer has any knowledge.	_			_
Her				CFO			the IRS discuss the preparer sl		
		ignature of officer	Date	Title			structions)? X Y		
		Print/Type preparer's name	Preparer's sig	gnature	Date	Check	if PTIN		_
Paid		DEVIN L. DUNCAN	de	mana	11/11/15	self-empl		249521	
-	oarer	Firm's name ► KPMG LLP	1		•	Firm's Ell	12 556		_
use	Only	Firm's address > 345 PARK AVE	NUE			Phone no		8-9700	_
		· · · · · · · · · · · · · · · · · · ·	10154-0102					90-T (201	

JSA

4X2741 2.000 27617M 2231 V 14-7.3F 2176152 Form 990-T (2014) Page 3

Schedule C - Rent Income (see instructions)	e (From Real Pro	perty a	nd Personal Prope	erty	Leased Wi	th Real Prope	erty)	
1. Description of property								
(1)								
(2)								
(3)								
(4)								
	2. Rent receive	d or accrue	ed					
(a) From personal property (if the for personal property is more the more than 50%)		percenta	rom real and personal pro age of rent for personal pro if the rent is based on pro	exceeds			nected with the income) (attach schedule)	
(1)								
(2)								
(3)								
(4)								
Total	Т	otal						
(c) Total income. Add totals of co	, column (A)	. ▶				(b) Total deducti Enter here and o Part I, line 6, colu	n page 1,	
Schedule E - Unrelated De	ebt-Financed Inc	ome (se	e instructions)					
4. December them of shelp	t Conservation		2. Gross income from		3. De	ductions directly co debt-finan	onnected wi ced propert	
1. Description of deb	т-ппапсеа ргорепу		allocable to debt-finance property	ed		line depreciation schedule)	(b) Other deductions (attach schedule)	
(1)								
(2)								
(3)								
(4)								
Amount of average acquisition debt on or allocable to debt-financed property (attach schedule)	 Average adjusted basis of or allocable to debt-financed property (attach schedule) 		6. Column 4 divided by column 5			come reportable 2 x column 6)		llocable deductions n 6 x total of columns 3(a) and 3(b))
(1)				%				
(2)				%				
(3)				%				
(4)				%				
Totals Total dividends-received deducti Schedule F - Interest, Anr	ions included in colu	mn 8		►	Part I, line	and on page 1, 7, column (A). Ons (see instru	Part I,	ere and on page 1, line 7, column (B).
	-	Ex	empt Controlled Or	ganiz	zations			
Name of controlled organization	2. Employer identification numb		3. Net unrelated income (loss) (see instructions)		otal of specified ayments made	5. Part of column included in the corganization's gro	controlling	6. Deductions directly connected with income in column 5
(1)								
(2)								
(3)								
(4)								
Nonexempt Controlled Organ	nizations							
7. Taxable Income	8. Net unrelated i (loss) (see instruc		9. Total of specific payments made		includ	rt of column 9 that is ed in the controlling cation's gross income	cor	I. Deductions directly inected with income in column 10
(1)								
(2)								
(3)								
(4)								
Totals					Enter	columns 5 and 10. here and on page 1, , line 8, column (A).	Ent	dd columns 6 and 11. ter here and on page 1, rt I, line 8, column (B).

Form **990-T** (2014)

Page 4

Schedule G - Investment In	ncome of a Sec	tion 501(c <u>)</u> (7		nization (see ins	structions)	
1. Description of income	2. Amount of	income	3. Deductions directly connected (attach schedule)		et-asides n schedule)	5. Total deductions and set-asides (col. 3 plus col. 4)
(1)						
(2)						
(3)						
(4)						
	Enter here and Part I, line 9, co					Enter here and on page 1 Part I, line 9, column (B)
	Tart i, inic 3, o	olumn (71).				Tarri, iiile 3, colainii (b)
Totals ▶						
Schedule I - Exploited Exe	empt Activity In	come, Other	Than Advertising In	come (see instr	uctions)	
		2 Evenence	4. Net income (loss)			7 Evenes evemnt
1. Description of exploited activity	2. Gross unrelated business income from trade or business	3. Expenses directly connected with production of unrelated business income	If a gain, compute	5. Gross income from activity that is not unrelated business income	6. Expenses attributable to column 5	7. Excess exempt expenses (column 6 minus column 5, but not more than column 4).
(4)						
(1)						
(2)						
(3)						
(4)	Enter here and on	Enter here and o	200			Enter here and
Totals	page 1, Part I, line 10, col. (A).	page 1, Part I, line 10, col. (B)				on page 1, Part II, line 26.
Totals ► Schedule J - Advertising In	como (soo instri	uctions)				
Part I Income From Per			colidated Basis			
income From Fer		eu on a cons	Soliuateu Dasis			
1. Name of periodical	2. Gross advertising income	3. Direct advertising cost:	4. Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5. Circulation income	6. Readership costs	7. Excess readership costs (column 6 minus column 5, but not more than column 4).
(1)						
(2)						
(3)						
(4)						
Totals (carry to Part II, line (5))						
Part II Income From Pe 2 through 7 on a I			parate Basis (For e	each periodical	listed in Part	II, fill in columns
			4. Advertising			7. Excess readership
1. Name of periodical	2. Gross advertising income	3. Direct advertising costs	gain or (loss) (col.	5. Circulation income	6. Readership costs	costs (column 6
(1)						
(2)						
(3)						
(4)						
Totals from Part I				L		
	Enter here and on page 1, Part I, line 11, col. (A).	Enter here and o page 1, Part I, line 11, col. (B)				Enter here and on page 1, Part II, line 27.
Totals, Part II (lines 1-5)	(O(()		I T (
Schedule K - Compensatio	on of Officers, D	irectors, and	2. Title	3. Percent of time devoted		ensation attributable to
			4. 1100	business		related business
<u>(1)</u>					%	
(2)					%	
(3)					%	
(4)					%	
Total. Enter here and on page 1, P	Part II, line 14				. ▶	

Form **990-T** (2014)

SCHEDULE D (Form 1120)

Department of the Treasury Internal Revenue Service

Capital Gains and Losses

► Attach to Form 1120, 1120-C, 1120-F, 1120-FSC, 1120-H, 1120-IC-DISC, 1120-L, 1120-ND, 1120-PC, 1120-POL, 1120-REIT, 1120-RIC, 1120-SF, or certain Forms 990-T.

▶ Information about Schedule D (Form 1120) and its separate instructions is at www.irs.gov/form1120.

OMB No. 1545-0123

2014

Name Employer identification number
AMERICAN JEWISH COMMITTEE 13-5563393

Short-Term Capital Gains and Losses - Assets Held One Year or Less

	See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments t or loss from Form 8949, Part I, line column (g)	ı(s)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
1a	Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 1b			(3)		
1b	Totals for all transactions reported on Form(s) 8949 with Box A checked					
2	Totals for all transactions reported on Form(s) 8949 with Box B checked					
3	Totals for all transactions reported on Form(s) 8949 with Box C checked	2,340.				2,340.
4	Short-term capital gain from installment sales from	Form 6252, line 26 or 3	37		4	
5	Short-term capital gain or (loss) from like-kind excha				5	
6	Unused capital loss carryover (attach computation)				6	()
	Net short-term capital gain or (loss). Combine lines				7	2,340.
Part	·	s - Assets Held Mo	ore Than One Yea	1		Taxa a x
	See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to	o gain ı(s) : 2,	(h) Gain or (loss) Subtract column (e) from column (d) and combine			
	whole dollars.	(sales price)	(or other basis)	column (g)		the result with column (g)
8a 	Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b					
8b	Totals for all transactions reported on Form(s) 8949 with Box D checked					
9	Totals for all transactions reported on Form(s) 8949 with Box E checked					
10	Totals for all transactions reported on Form(s) 8949 with Box F checked.	8,492.				8,492.
11	Enter gain from Form 4797, line 7 or 9				11	
12	Long-term capital gain from installment sales from F	Form 6252, line 26 or 3	7		12	
13	Long-term capital gain or (loss) from like-kind exchar	nges from Form 8824			13	
14	Capital gain distributions (see instructions)				14	
15	Net long-term capital gain or (loss). Combine lines 8	a through 14 in column	nh		15	8,492.
Part	Summary of Parts I and II					
16	Enter excess of net short-term capital gain (line 7) of	ver net long-term capita	al loss (line 15)		16	2,340.
17	Net capital gain. Enter excess of net long-term capi	tal gain (line 15) over n	et short-term capital los	s (line 7)	17	8,492.
18	Add lines 16 and 17. Enter here and on Form 1120		proper line on other retu	urns	18	10,832.

For Paperwork Reduction Act Notice, see the Instructions for Form 1120.

Schedule D (Form 1120) (2014)

Sales and Other Dispositions of Capital Assets

▶ Information about Form 8949 and its separate instructions is at www.irs.gov/form8949.

Department of the Treasury Internal Revenue Service Name(s) shown on return

File with your Schedule D to list your transactions for lines 1b, 2, 3, 8b, 9, and 10 of Schedule D.

Attachment Sequence No. 12A

OMB No. 1545-0074

AMERICAN JEWISH COMMITTEE

Social security number or taxpayer identification number

13-5563393

Before you check Box A, B, or C below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either may show your basis (usually your cost) even if your broker did not report it to the IRS. Brokers must report basis to the IRS for most stock you bought in 2011 or later (and for certain debt instruments your bought in 2014 or later).

Short-Term. Transactions involving capital assets you held 1 year or less are short-term. For long-term transactions, see page 2.

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

You must check Box A, B, or C below. Check only one box. If more than one box applies for your short-term transactions, complete a separate Form 8949, page 1, for each applicable box. If you have more short-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need. (A) Short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above) (B) Short-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS (C) Short-term transactions not reported to you on Form 1099-B

(a) Description of property (Example: 100 sh. XYZ Co.)	(b) Date acquired (Mo., day, yr.)	(c) Date sold or disposed (Mo., day, yr.)	(d) Proceeds (sales price) (see instructions)	(e) Cost or other basis. See the Note below and see Column (e) in the separate	If you enter an enter a co	any, to gain or loss. amount in column (g), de in column (f). arate instructions. (g) Amount of	(h) Gain or (loss). Subtract column (e) from column (d) and combine the result
				instructions	instructions	adjustment	with column (g)
STCG FROM ANCHORAGE CAPITAL PARTN	VARIOUS	VARIOUS	2,340.				2,340.
2 Totals. Add the amounts in column act negative amounts). Enter each your Schedule D, line 1b (if Box A Box B above is checked), or line 3	total here an above is check	d include on ed), line 2 (if	2,340.				2,340.

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

For Paperwork Reduction Act Notice, see your tax return instructions.

Form 8949 (2014)

Form 8949 (2014) Attachment Sequence No. 12A Page 2

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

AMERICAN JEWISH COMMITTEE

Social security number or taxpayer identification number

13-5563393

Before you check Box D, E, or F below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either may show your basis (usually your cost) even if your broker did not report it to the IRS. Brokers must report basis to the IRS for most stock you bought in 2011 or later (and for certain debt instruments you bought in 2014 or later).

Part II

Long-Term. Transactions involving capital assets you held more than 1 year are long term. For short-term transactions, see page 1.

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

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

moı	re of the boxes, complete as ma	any forms wit	h the same b	ox checked as y	ou need.			
	(D) Long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above)							
	(E) Long-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS							
X	(F) Long-term transactions not reported to you on Form 1099-B							
1						Adjustment, if any, to gain or loss.	(h)	

(a) Description of property	(b) Date acquired	(c) Date sold or	(d) Proceeds	(e) Cost or other basis. See the	Adjustment, if a lf you enter a co see the sepa	(h) Gain or (loss). Subtract column (e) from column (d) and	
(Example: 100 sh. XYZ Co.)	(Mo., day, yr.)	disposed (Mo., day, yr.)	(sales price) (see instructions)	Note below and see Column (e) in the separate instructions	(f) Code(s) from instructions	(g) Amount of adjustment	combine the result with column (g)
LTCG FROM ANCHORAGE CAPITAL PARTN	VARIOUS	VARIOUS	8,492.				8,492.
-							
2 Totals. Add the amounts in colu (subtract negative amounts). Elinclude on your Schedule D, linchecked), line 9 (if Box E above (if Box F above is checked) ▶	nter each tota e 8b (if Box D	I here and above is	8,492.				8,492.

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

Form **8949** (2014)

ATTACHMENT 1

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

ANCHORAGE CAPITAL PARTNERS LP COPPER TERRACE, LTD.

89. 36,557.

INCOME (LOSS) FROM PARTNERSHIPS

36,646.

ATTACHMENT 2

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

TAX PREPARATION FEE 4,800.

PART II - LINE 28 - OTHER DEDUCTIONS

4,800.

AMERICAN JEWISH COMMITTEE

December 31, 2014

13-5563393

STATE TAXES

COLORADO				\$	1,581	
NEW YORK				\$	250	
	TOTAL	STATE	TAXES	\$	1,831	

Net Operating Loss Carryforward

	FEDERAL
	_
6/30/1996	226,950
6/30/1997	239,616
6/30/1998	342,032
6/30/1999	291,544
6/30/2000	413,859
6/30/2001	381,567
6/30/2002	433,279
6/30/2003	190,314
6/30/2004	240,561
6/30/2005	261,398
6/30/2006	315,794
6/30/2007	122,692
6/30/2008	-
6/30/2009	-
12/31/2009 - Short Year	4,226
12/31/2010	3,417
12/31/2011	26,052
12/31/2012	3,721
12/31/2013	68
Utilized 12/31/2014	(40,847)
NET OPERATING LOSS CARRYFORWARD	
TO 12/31/2015	\$ 3,456,243

FEDERAL FOOTNOTES

SUPPLEMENTARY INFORMATION:

FEDERAL FORM 926 - RETURN BY A U.S. TRANSFEROR OF PROPERTY TO A FOREIGN CORPORATION

FEDERAL FORM 8621 - INFORMATION RETURN BY A SHAREHOLDER OF A PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND

Form **8621**

(Rev. December 2014) Department of the Treasury Internal Revenue Service

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

▶ Information about Form 8621 and its separate instructions is at www.irs.gov/form8621.

OMB No. 1545-1002

Attachment Sequence No. **69**

Name of shareholder	Identifying number (see instructions)
AMERICAN JEWISH COMMITTEE	13-5563393
Number, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other tax year
165 EAST 56TH STREET	beginning and ending .
City or town, state, and ZIP code or country	
NEW YORK, NY 10022-2709 Check type of shareholder filing the return: Individual × Corporation	Partnership S Corporation Nongrantor Trust Estate
Check type of shareholder filing the return: Individual x Corporation Name of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number (if any)
ALPSTAR CLO 2 P.L.C	N/A
Address (Enter number, street, city or town, and country.)	Reference ID number (see instructions)
5 HARBOURMASTER PLACE, INTERNATIONAL FINANCIAL	AJCAC2PLC
SERVICES CENTER, DUBLIN 1, IRELAND	Tax year of PFIC or QEF: calendar year 2014 or other tax year
	beginning and
Part I Cummony of Annual Information (Conjugate estimate)	ending .
Part I Summary of Annual Information (See instructions.) Provide the following information with respect to all shares of the PFIC held by the	o sharshalder:
Provide the following information with respect to all shares of the Pric held by the	a Strateriolder.
1 Description of each class of shares held by the shareholder: VARIOUS	- SEE STATEMENT 1
Check if shares jointly owned with spouse.	
2 Date shares acquired during the taxable year, if applicable: VARIOUS	- SEE STATEMENT 1
3 Number of shares held at the end of the taxable year: VARIOUS	- SEE STATEMENT 1
4 Value of shares held at the end of the taxable year (check the appropriate bo	ox if applicable):
(a) X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-15	
(e) If more than \$200,000, list value:	, , , , , , , , , , , , , , , , , , ,
5 Type of PFIC and amount of any excess distribution or gain treated as an excess.	cess distribution
under section 1291, inclusion under section 1293, or inclusion or deduction	n under section 1296:
(a) X Section 1291 \$ VARIOUS SEE STATEMENT 1	
(a) X Section 1291 \$ VARIOUS SEE STATEMENT 1 (b) Section 1293 (Qualified Electing Fund) \$	
(c) Section 1296 (Mark to Market) \$	
(-)	
Part II Elections (See instructions.)	
A Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to tree	,
B Election To Extend Time For Payment of Tax. I, a shareholder of a QEF earnings and profits of the QEF until this election is terminated. <i>Complete</i>	
Note: If any portion of line 6a or line 7a of Part III is includible under section	,
and 1294(f) and the related regulations for events that terminate this elect	
C Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elec	t to mark-to-market the DEIC stock that is marketable within the
meaning of section 1296(e). Complete Part IV.	t to mark-to-market the FFFTO Stock that is marketable within the
D Deemed Sale Election. I, a shareholder on the first day of a PFIC's first t	ax year as a QEF, elect to recognize gain on the deemed sale of my
interest in the PFIC. Enter gain or loss on line 15f of Part V.	
E Deemed Dividend Election. I, a shareholder on the first day of a PFIC's fi elect to treat an amount equal to my share of the post-1986 earnings an line 15e of Part V. If the excess distribution is greater than zero, also comp	d profits of the CFC as an excess distribution. Enter this amount on
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder o	, , , , ,
treat as an excess distribution the gain recognized on the deemed sale ounder section 1297(a). Enter gain on line 15f of Part V.	if my interest in the PFIC on the last day of its last tax year as a PFIC
	a charabolder of a gootion 1907/o) PEIC within the magning of
G Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a Regulations section 1.1297-3(a), elect to make a deemed dividend election 1.1297-3(b).	
stock of the Section 1297(e) PFIC includes the CFC qualification date, a distribution on line 15e, Part V. If the excess distribution is greater than ze	
H Deemed Dividend Election With Respect to a Former PFIC. I, a shareho	•
1.1298-3(a), elect to make a deemed dividend election with respect to the includes the termination date, as defined in Regulations section 1.1298-3 distribution is greater than zero, also complete line 16, Part V.	he former PFIC. My holding period in the stock of the former PFIC

Form 8621 (Rev. 12-2014)

Part	Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a th	nrough 7c. If you are ma	king
	Election B, also complete lines 8a through 9c. (See instructions.)		
6a	Enter your pro rata share of the ordinary earnings of the QEF 6a		
b	Enter the portion of line 6a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income	6c	
7a	Enter your pro rata share of the total net capital gain of the QEF		
b	Enter the portion of line 7a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount in Part II of the		
	Schedule D used for your income tax return. (See instructions.)	7c	
8a	Add lines 6c and 7c	8a	
b	Enter the total amount of cash and the fair market value of other property distributed		
	or deemed distributed to you during the tax year of the QEF. (See instructions.) 8b		
С	Enter the portion of line 8a not already included in line 8b that is attributable to		
	shares in the QEF that you disposed of, pledged, or otherwise transferred during the		
	tax year		
d	Add lines 8b and 8c	8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible in income under section		
	951, you may make Election B with respect to the amount on line 8e.		
9a	Enter the total tax for the tax year (See instructions.)		
b	Enter the total tax for the tax year determined without regard to the amount		
	entered on line 8e		
С	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by	0-	
Part	making Election B. See instructions	9c	
10 a	Enter the fair market value of your PFIC stock at the end of the tax year	10a	
b	Enter your adjusted basis in the stock at the end of the tax year	10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary	100	
·	income on your tax return. If a loss, go to line 11	10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))	11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as		
	an ordinary loss on your tax return	12	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:		
а	Enter the fair market value of the stock on the date of sale or disposition	13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition	13b	
С	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on		
	your tax return. If a loss, go to line 14	13c	
14 a	Enter any unreversed inclusions (as defined in section 1296(d))	14a	
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as		
	an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete		
	line 14c	14b	
С	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount		
	on your tax return according to the rules generally applicable for losses provided elsewhere in the Code and		
	regulations	14c	
	Note. See instructions in case of multiple sales or dispositions.		

Form 8621 (Rev. 12-2014) Page 3 Distributions From and Dispositions of Stock of a Section 1291 Fund (See instructions.) Part V SEE STATEMENT Complete a **separate** Part V for each excess distribution and disposition (see instructions) 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the 15a applicable stock. If the holding period of the stock began in the current tax year, see instructions Enter the total distributions (reduced by the portions of such distributions that were excess distributions but b not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b 15c Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) 15d d Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution 15e Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income. 16b Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). (See instructions.) 16d 16e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. (See instructions.) Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Part VI Complete a separate column for each outstanding election. Complete lines 25 and 26 only if there is a partial termination of the section 1294 election. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates . . 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election. . 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return 24 Accrued interest due with this

PARTNERSHIP NAME: PARTNERSHIP EIN: INVESTOR NAME: INVESTOR EIN: ANCHORAGE CAPITAL PARTNERS, LP 20-0059325 AMERICAN JEWISH COMMITTEE 13-5563393

PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICS"):
DURING THE 2014 TAX YEAR, ANCHORAGE CAPITAL PARTNERS, LP INVESTED IN PFICS. THESE PFICS
WILL BE GOVERNED UNDER THE EXCESS DISTRIBUTION REGIME PER IRC SECTION 1291.

YOU WILL NEED THE BELOW INFORMATION TO REPORT ON FORM 8621, "RETURN BY A SHAREHOLDER OF A PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND."

PLEASE CONSULT YOUR TAX ADVISOR.

NAME:		,	ALPSTAR CLO 2 P.L.C.		ALPSTAR CLO 2 P.L.C.	ALPSTAR CLO 2 P.L.C.	ALPSTAR CLO 2 P.L.C.
ADDRESS:				-			
			ARBOURMASTER PLACE ERNATIONAL FINANCIAL SERVICES CENTER DUBLIN 1, IRELAND		5 HARBOURMASTER PLACE INTERNATIONAL FINANCIAL SERVICES CENTER DUBLIN 1, IRELAND	5 HARBOURMASTER PLACE INTERNATIONAL FINANCIAL SERVICES CENTER DUBLIN 1, IRELAND	5 HARBOURMASTER PLACE INTERNATIONAL FINANCIAL SERVICES CENTER DUBLIN 1, IRELAND
PFIC EIN:			N/A	- 1	N/A	N/A	N/A
		JANI	JARY 1, 2014 - DECEMBE	R	JANUARY 1, 2014 - DECEMBER	JANUARY 1, 2014 - DECEMBER	JANUARY 1, 2014 - DECEMBER
PFIC TAX YEAR:			31, 2014	_	31, 2014	31, 2014	31, 2014
PART I SUMMARY OF ANN		l		- 1			
LINE 1:	DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER	s	UBORDINATED NOTES	- 1	SUBORDINATED NOTES	SUBORDINATED NOTES	SUBORDINATED NOTES
LINE 2:	DATE SHARES ACQUIRED DURING THE TAXABLE YEAR. IF APPLICABLE	l	N/A	- 1	N/A	N/A	N/A
LINE 3:	NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR	l	1	07	732	377	1,297
LINE 4:	VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR	\$		86			\$ 734
LINE 5:	TYPE OF PFIC	l	SECTION 1291	- 1	SECTION 1291	SECTION 1291	SECTION 1291
LINE 5A/B/C:	INCOME INCLUSION	\$		20	\$ 244	\$ 125	\$ 432
PART V DISTRIBUTIONS FR	OM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND	l		- 1			
	DATE OF ACQUISITION	l	3/10/2011	- 1	12/16/2010	12/16/2010	11/23/2010
LINE 15A (NOTE 1):		\$	-	٠ ا	\$ -	\$ -	\$ -
LINE 15B:	TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEEDING THE	s	_	. 1	\$ -	s -	٠ .
	CURRENT TAX YEAR	I.		- 1			
LINE 15E:	EXCESS DISTRIBUTION	\$.		١.	\$	1/1/2014 - DEEMED SALE	\$
	DATE OF SALE COST BASIS	1,	/1/2014 - DEEMED SALE	62	1/1/2014 - DEEMED SALE \$ 156		1/1/2014 - DEEMED SALE \$ 277
LINE 15F (NOTE 2):	GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER	٥		· I	-) a	\$ 277
LINE 15F (NOTE 2).	SECTION 1291 FUND	\$		20	\$ 244	\$ 125	\$ 432
	LOSS FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND	\$	-	.	\$ -	\$ -	s -

⁽¹⁾ THESE AMOUNTS ARE INCLUDED IN LINE 6A OF YOUR SCHEDULE K-1. PLEASE CONSULT YOUR TAX ADVISOR.

(2) THE GAIN AMOUNTS ARE INCLUDED IN LINE 6A OF YOUR SCHEDULE K-1; LOSS AMOUNTS ARE INCLUDED IN LINE 9A OF YOUR SCHEDULE K-1. PLEASE CONSULT YOUR TAX ADVISOR.

Form 8621

(Rev. December 2014) Department of the Treasury Internal Revenue Service

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

▶ Information about Form 8621 and its separate instructions is at www.irs.gov/form8621.

OMB No. 1545-1002

Attachment Sequence No. **69**

The man revenue of the	· · · · · · · · · · · · · · · · · · ·
Name of shareholder	Identifying number (see instructions)
AMERICAN JEWISH COMMITTEE	13-5563393
Number, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other tax year
165 EAST 56TH STREET	beginning and ending .
City or town, state, and ZIP code or country	
NEW YORK, NY 10022-2709	Destruction Communities New yearter Treet February
Check type of shareholder filing the return: Individual X Corporation Name of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Partnership S Corporation Nongrantor Trust Estate Employer identification number (if any)
CAIRN CLO II B.V.	N/A
Address (Enter number, street, city or town, and country.)	Reference ID number (see instructions)
PARNASSUSTOREN, LOCATELLIKADE 1	AJCCCIIBV
1076 AZ, AMSTERDAM, THE NETHERLANDS	Tax year of PFIC or QEF: calendar year 2014 or other tax year
	beginning and
	ending .
Summary of Annual Information (See instructions.)	
Provide the following information with respect to all shares of the PFIC held b	y the snareholder:
1 Description of each class of shares held by the shareholder: VARIOU	S SEE STATEMENT 1
Check if shares jointly owned with spouse.	
Gridon in chiarco joinny china mai opoaco.	
2 Date shares acquired during the taxable year, if applicable:VARIOU	S SEE STATEMENT 1
3 Number of shares held at the end of the taxable year:VARIOUS	S SEE STATEMENT 1
4	As how Manager to the law.
Value of shares held at the end of the taxable year (check the appropriat (a) X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001	
(e) If more than \$200,000, list value:	
(e) It more than \$200,000, list value.	
5 Type of PFIC and amount of any excess distribution or gain treated as ar	n excess distribution
under section 1291, inclusion under section 1293, or inclusion or dedu	ction under section 1296:
CEE CHAMEMEN 1	
(a) X Section 1291 \$ VARIOUS SEE STATEMENT 1	
(b) Section 1293 (Qualified Electing Fund) \$	
(c) Section 1296 (Mark to Market) \$	
Part II Elections (See instructions.)	
A Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to	to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B Election To Extend Time For Payment of Tax. I, a shareholder of a G	,
	ection 951, you may not make this election. Also, see sections 1294(c)
and 1294(f) and the related regulations for events that terminate this e	HECUON.
C Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, meaning of section 1296(e). Complete Part IV.	elect to mark-to-market the PFIC stock that is marketable within the
Deemed Sale Election. I, a shareholder on the first day of a PFIC's fi interest in the PFIC. Enter gain or loss on line 15f of Part V.	irst tax year as a QEF, elect to recognize gain on the deemed sale of my
Deemed Dividend Election. I, a shareholder on the first day of a PFIC elect to treat an amount equal to my share of the post-1986 earnings line 15e of Part V. If the excess distribution is greater than zero, also c	s and profits of the CFC as an excess distribution. Enter this amount on
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholde	er of a former PFIC or a PFIC to which section 1297(d) applies, elect to ale of my interest in the PFIC on the last day of its last tax year as a PFIC
under section 1297(a). Enter gain on line 15f of Part V.	
G Deemed Dividend Election With Respect to a Section 1297(e) PFIC. Regulations section 1.1297-3(a), elect to make a deemed dividend estock of the Section 1297(e) PFIC includes the CFC qualification date distribution on line 15e, Part V. If the excess distribution is greater than	election with respect to the Section 1297(e) PFIC. My holding period in the te, as defined in Regulations section 1.1297-3(d). Enter the excess
H Deemed Dividend Election With Respect to a Former PFIC. I, a shar 1.1298-3(a), elect to make a deemed dividend election with respect includes the termination date, as defined in Regulations section 1.129 distribution is greater than zero, also complete line 16, Part V.	to the former PFIC. My holding period in the stock of the former PFIC

Form 8621 (Rev. 12-2014)

Part	Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a th	nrough 7c. If you are ma	king
	Election B, also complete lines 8a through 9c. (See instructions.)		
6a	Enter your pro rata share of the ordinary earnings of the QEF 6a		
b	Enter the portion of line 6a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income	6c	
7a	Enter your pro rata share of the total net capital gain of the QEF		
b	Enter the portion of line 7a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount in Part II of the		
	Schedule D used for your income tax return. (See instructions.)	7c	
8a	Add lines 6c and 7c	8a	
b	Enter the total amount of cash and the fair market value of other property distributed		
	or deemed distributed to you during the tax year of the QEF. (See instructions.) 8b		
С	Enter the portion of line 8a not already included in line 8b that is attributable to		
	shares in the QEF that you disposed of, pledged, or otherwise transferred during the		
	tax year		
d	Add lines 8b and 8c	8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible in income under section		
	951, you may make Election B with respect to the amount on line 8e.		
9a	Enter the total tax for the tax year (See instructions.)		
b	Enter the total tax for the tax year determined without regard to the amount		
	entered on line 8e		
С	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by	0-	
Part	making Election B. See instructions	9c	
10 a	Enter the fair market value of your PFIC stock at the end of the tax year	10a	
b	Enter your adjusted basis in the stock at the end of the tax year	10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary	100	
·	income on your tax return. If a loss, go to line 11	10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))	11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as		
	an ordinary loss on your tax return	12	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:		
а	Enter the fair market value of the stock on the date of sale or disposition	13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition	13b	
С	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on		
	your tax return. If a loss, go to line 14	13c	
14 a	Enter any unreversed inclusions (as defined in section 1296(d))	14a	
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as		
	an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete		
	line 14c	14b	
С	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount		
	on your tax return according to the rules generally applicable for losses provided elsewhere in the Code and		
	regulations	14c	
	Note. See instructions in case of multiple sales or dispositions.		

Form 8621 (Rev. 12-2014) Page 3 Distributions From and Dispositions of Stock of a Section 1291 Fund (See instructions.)_{SEE STATEMENT} Part V Complete a separate Part V for each excess distribution and disposition (see instructions). 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the 15a applicable stock. If the holding period of the stock began in the current tax year, see instructions Enter the total distributions (reduced by the portions of such distributions that were excess distributions but b not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b 15c Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) 15d d Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution 15e Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income. 16b Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). (See instructions.) 16d 16e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. (See instructions.) Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Part VI Complete a separate column for each outstanding election. Complete lines 25 and 26 only if there is a partial termination of the section 1294 election. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates . . 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election. . 22 Earnings distributed or deemed distributed during the

Form **8621** (Rev. 12-2014)

tax year

23 Deferred tax due with this return

24 Accrued interest due with this return

25 Deferred tax outstanding after partial termination of election

26 Interest accrued after partial termination of election

PARTNERSHIP NAME: PARTNERSHIP EIN: INVESTOR NAME: INVESTOR EIN: ANCHORAGE CAPITAL PARTNERS, LP 20-0059325 AMERICAN JEWISH COMMITTEE 13-5563393

PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICS"):
DURING THE 2014 TAX YEAR, ANCHORAGE CAPITAL PARTNERS, LP INVESTED IN PFICS. THESE PFICS
WILL BE GOVERNED UNDER THE EXCESS DISTRIBUTION REGIME PER IRC SECTION 1291.

YOU WILL NEED THE BELOW INFORMATION TO REPORT ON FORM 8621, "RETURN BY A SHAREHOLDER OF A PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND."

PLEASE CONSULT YOUR TAX ADVISOR.

NAME:			CAIRN CLO II B.V.			CAIRN CLO II B.V.	
ADDRESS:			PARNASSUSTOREN LOCATELLIKADE 1 1076 AZ AMSTERDAM, THE NETHERLANDS	,		PARNASSUSTOREN LOCATELLIKADE 1 1076 AZ AMSTERDAM, THE NETHERLANDS	
PFIC EIN: PFIC TAX YEAR:		JANU	N/A IARY 1, 2014 - DECE 31, 2014	MBER	JANI	N/A JARY 1, 2014 - DECE 31, 2014	MBER
PART I SUMMARY OF ANN	UAL INFORMATION						\neg
LINE 1:	DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER	SI	JBORDINATED NOT	ES	s	UBORDINATED NOT	ES
LINE 2: LINE 3: LINE 4: LINE 5: LINE 5A/B/C:	DATE SHARES ACQUIRED DURING THE TAXABLE YEAR, IF APPLICABLE NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR TYPE OF PFIC INCOME INCLUSION	\$	N/A SECTION 1291	:	\$	N/A SECTION 1291	- - 404
PART V DISTRIBUTIONS FI	ROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND	l					
LINE 15A (NOTE 1): LINE 15B:	DATE OF ACQUISITION	\$	3/14/2013	432 718	\$ \$	9/16/2010	159 325
LINE 15E:	EXCESS DISTRIBUTION DATE OF SALE COST BASIS	\$	9/11/2014	- 1,825	\$ \$	9/11/2014	23 259
LINE 15F (NOTE 2):	GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND LOSS FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER	\$		- (82)	\$		381
1	SECTION 1291 FUND	ľ		(02)	l ª		- 1

⁽¹⁾ THESE AMOUNTS ARE INCLUDED IN LINE 6A OF YOUR SCHEDULE K-1. PLEASE CONSULT YOUR TAX ADVISOR.

(2) THE GAIN AMOUNTS ARE INCLUDED IN LINE 6A OF YOUR SCHEDULE K-1; LOSS AMOUNTS ARE INCLUDED IN LINE 9A OF YOUR SCHEDULE K-1. PLEASE CONSULT YOUR TAX ADVISOR.

Form **8621**

(Rev. December 2014)
Department of the Treasury
Internal Revenue Service

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

▶ Information about Form 8621 and its separate instructions is at www.irs.gov/form8621.

OMB No. 1545-1002

Attachment Sequence No. **69**

memai Revenue Service	ato monutono lo di mana ago monuto an
Jame of shareholder	Identifying number (see instructions)
AMERICAN JEWISH COMMITTEE	13-5563393
Number, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year2014 or other tax year
165 EAST 56TH STREET City or town, state, and ZIP code or country	beginning and ending .
NEW YORK, NY 10022-2709 Check type of shareholder filing the return: Individual X Corporation	Partnership S Corporation Nongrantor Trust Estate
lame of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number (if any)
CORDATUS CLO I P.L.C.	N/A
Address (Enter number, street, city or town, and country.)	Reference ID number (see instructions)
C/O DEUTSCHE INTERNATIONAL CORPORATE SERVICES (IRELAND)	AJCCCIPLC
LIMITED, 5 HARBOURMASTER PLACE, DUBLIN 1, IRELAND	Tax year of PFIC or QEF: calendar year or other tax year
	beginning JULY 1, 2013 and
	ending JUNE 30, 2014
Part I Summary of Annual Information (See instructions.)	
Provide the following information with respect to all shares of the PFIC held by	y the shareholder:
1 Description of each class of shares held by the shareholder: SUBORD:	INATED NOTES
Check if shares jointly owned with spouse.	
2 Data shares associated decision the taughts were if applicables M/A	
2 Date shares acquired during the taxable year, if applicable: N/A	
3 Number of shares held at the end of the taxable year: 0	
Number of shares held at the end of the taxable year:0	
4 Value of shares held at the end of the taxable year (check the appropriat	te box, if applicable):
(a) X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001	
(e) If more than \$200,000, list value:	
5 Type of PFIC and amount of any excess distribution or gain treated as ar	n excess distribution
under section 1291, inclusion under section 1293, or inclusion or dedu	ction under section 1296:
(a) X Section 1291 \$ 515.00	
(b) Section 1293 (Qualified Electing Fund) \$	
(c) Section 1296 (Mark to Market) \$	
Part II Elections (See instructions.)	
· ·	a treat the DEIC on a OFF. Commission lines to through 70 of Dort III
B Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to Election To Extend Time For Payment of Tax. I, a shareholder of a C earnings and profits of the QEF until this election is terminated. Comp	,
Note: If any portion of line 6a or line 7a of Part III is includible under se	
and 1294(f) and the related regulations for events that terminate this e	ection.
Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, meaning of section 1296(e). Complete Part IV.	elect to mark-to-market the PFIC stock that is marketable within the
Deemed Sale Election. I, a shareholder on the first day of a PFIC's fi interest in the PFIC. Enter gain or loss on line 15f of Part V.	rst tax year as a QEF, elect to recognize gain on the deemed sale of my
Deemed Dividend Election. I, a shareholder on the first day of a PFIC elect to treat an amount equal to my share of the post-1986 earnings line 15e of Part V. If the excess distribution is greater than zero, also c	s and profits of the CFC as an excess distribution. Enter this amount on
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder	
G Deemed Dividend Election With Respect to a Section 1297(e) PFIC. Regulations section 1.1297-3(a), elect to make a deemed dividend estock of the Section 1297(e) PFIC includes the CFC qualification date distribution on line 15e, Part V. If the excess distribution is greater than	election with respect to the Section 1297(e) PFIC. My holding period in the ele, as defined in Regulations section 1.1297-3(d). Enter the excess
H Deemed Dividend Election With Respect to a Former PFIC. I, a shart 1.1298-3(a), elect to make a deemed dividend election with respect includes the termination date, as defined in Regulations section 1.129 distribution is greater than zero, also complete line 16, Part V.	reholder of a former PFIC, within the meaning of Regulations section to the former PFIC. My holding period in the stock of the former PFIC

Form 8621 (Rev. 12-2014)

Part	Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a th	nrough 7c. If you are ma	king
	Election B, also complete lines 8a through 9c. (See instructions.)		
6a	Enter your pro rata share of the ordinary earnings of the QEF 6a		
b	Enter the portion of line 6a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income	6c	
7a	Enter your pro rata share of the total net capital gain of the QEF		
b	Enter the portion of line 7a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount in Part II of the		
	Schedule D used for your income tax return. (See instructions.)	7c	
8a	Add lines 6c and 7c	8a	
b	Enter the total amount of cash and the fair market value of other property distributed		
	or deemed distributed to you during the tax year of the QEF. (See instructions.) 8b		
С	Enter the portion of line 8a not already included in line 8b that is attributable to		
	shares in the QEF that you disposed of, pledged, or otherwise transferred during the		
	tax year		
d	Add lines 8b and 8c	8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible in income under section		
	951, you may make Election B with respect to the amount on line 8e.		
9a	Enter the total tax for the tax year (See instructions.)		
b	Enter the total tax for the tax year determined without regard to the amount		
	entered on line 8e		
С	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by	0-	
Part	making Election B. See instructions	9c	
10 a	Enter the fair market value of your PFIC stock at the end of the tax year	10a	
b	Enter your adjusted basis in the stock at the end of the tax year	10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary	100	
·	income on your tax return. If a loss, go to line 11	10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))	11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as		
	an ordinary loss on your tax return	12	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:		
а	Enter the fair market value of the stock on the date of sale or disposition	13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition	13b	
С	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on		
	your tax return. If a loss, go to line 14	13c	
14 a	Enter any unreversed inclusions (as defined in section 1296(d))	14a	
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as		
	an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete		
	line 14c	14b	
С	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount		
	on your tax return according to the rules generally applicable for losses provided elsewhere in the Code and		
	regulations	14c	
	Note. See instructions in case of multiple sales or dispositions.		

Form 8621 (Rev. 12-2014) Page 3 Distributions From and Dispositions of Stock of a Section 1291 Fund (See instructions.) Part V Complete a **separate** Part V for each excess distribution and disposition (see instructions). 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the 0.00 15a applicable stock. If the holding period of the stock began in the current tax year, see instructions Enter the total distributions (reduced by the portions of such distributions that were excess distributions but b not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period 0.00 before the current tax year) 15b 15c Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) 15d d Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution 0.00 15e Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, 515.00 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income. 16b Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). (See instructions.) 16d 16e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. (See instructions.) Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Part VI Complete a separate column for each outstanding election. Complete lines 25 and 26 only if there is a partial termination of the section 1294 election. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates . . 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election. . 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return 24 Accrued interest due with this

Form **8621**

(Rev. December 2014) Department of the Treasury Internal Revenue Service

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

▶ Information about Form 8621 and its separate instructions is at www.irs.gov/form8621.

OMB No. 1545-1002

Attachment Sequence No. **69**

lame of shareholder	Identifying number (see instructions)
AMERICAN JEWISH COMMITTEE	13-5563393
lumber, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other tax year
165 EAST 56TH STREET	beginning and ending .
City or town, state, and ZIP code or country	
NEW YORK, NY 10022-2709	
Check type of shareholder filing the return: Individual X Corporation	Partnership S Corporation Nongrantor Trust Estate
lame of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number (if any)
DALRADIAN EUROPEAN CLO III B.V.	N/A
Address (Enter number, street, city or town, and country.)	Reference ID number (see instructions)
ARNASSUSTOREN, LOCATELLIKADE 1	AJCDECIIIBV
076 AZ, AMSTERDAM, THE NETHERLANDS	Tax year of PFIC or QEF: calendar year 2014 or other tax year beginning and
	ending .
Part I Summary of Annual Information (See instructions.)	
Provide the following information with respect to all shares of the PFIC held by the	ne shareholder:
Trovide the following information with respect to an shares of the FFF to hold by the	io didicitoradi.
1 Description of each class of shares held by the shareholder: SUBORDIN	ATED NOTES
Check if shares jointly owned with spouse.	
2 Date shares acquired during the taxable year, if applicable: N/A	
3 Number of shares held at the end of the taxable year: 0	
4 Value of shares held at the end of the taxable year (check the appropriate b	• • •
(a) X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-18	50,000 (d) \$150,001-200,000
(e) If more than \$200,000, list value:	
Type of PFIC and amount of any excess distribution or gain treated as an excunder section 1291, inclusion under section 1293, or inclusion or deduction (a) X Section 1291 \$ 101.00 (b) Section 1293 (Qualified Electing Fund) \$	
Part I Elections (See instructions.)	
B Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to tr Election To Extend Time For Payment of Tax. I, a shareholder of a QEF earnings and profits of the QEF until this election is terminated. Complete	F, elect to extend the time for payment of tax on the undistributed
Note: If any portion of line 6a or line 7a of Part III is includible under section and 1294(f) and the related regulations for events that terminate this electrical endings of the section of the sect	
Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, electron meaning of section 1296(e). Complete Part IV.	ct to mark-to-market the PFIC stock that is marketable within the
Deemed Sale Election. I, a shareholder on the first day of a PFIC's first interest in the PFIC. <i>Enter gain or loss on line 15f of Part V.</i>	tax year as a QEF, elect to recognize gain on the deemed sale of my
Deemed Dividend Election. I, a shareholder on the first day of a PFIC's elect to treat an amount equal to my share of the post-1986 earnings ar line 15e of Part V. If the excess distribution is greater than zero, also com	nd profits of the CFC as an excess distribution. Enter this amount on
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of treat as an excess distribution the gain recognized on the deemed sale of under section 1297(a). Enter gain on line 15f of Part V.	
Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, Regulations section 1.1297-3(a), elect to make a deemed dividend elect stock of the Section 1297(e) PFIC includes the CFC qualification date, a distribution on line 15e, Part V. If the excess distribution is greater than 20	ction with respect to the Section 1297(e) PFIC. My holding period in the as defined in Regulations section 1.1297-3(d). <i>Enter the excess</i>
Deemed Dividend Election With Respect to a Former PFIC. I, a sharehous 1.1298-3(a), elect to make a deemed dividend election with respect to includes the termination date, as defined in Regulations section 1.1298-3 distribution is greater than zero, also complete line 16, Part V.	the former PFIC. My holding period in the stock of the former PFIC

Form 8621 (Rev. 12-2014)

Part	Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a th	nrough 7c. If you are ma	king
	Election B, also complete lines 8a through 9c. (See instructions.)		
6a	Enter your pro rata share of the ordinary earnings of the QEF 6a		
b	Enter the portion of line 6a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income	6c	
7a	Enter your pro rata share of the total net capital gain of the QEF		
b	Enter the portion of line 7a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount in Part II of the		
	Schedule D used for your income tax return. (See instructions.)	7c	
8a	Add lines 6c and 7c	8a	
b	Enter the total amount of cash and the fair market value of other property distributed		
	or deemed distributed to you during the tax year of the QEF. (See instructions.) 8b		
С	Enter the portion of line 8a not already included in line 8b that is attributable to		
	shares in the QEF that you disposed of, pledged, or otherwise transferred during the		
	tax year		
d	Add lines 8b and 8c	8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible in income under section		
	951, you may make Election B with respect to the amount on line 8e.		
9a	Enter the total tax for the tax year (See instructions.)		
b	Enter the total tax for the tax year determined without regard to the amount		
	entered on line 8e		
С	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by	0-	
Part	making Election B. See instructions	9c	
10 a	Enter the fair market value of your PFIC stock at the end of the tax year	10a	
b	Enter your adjusted basis in the stock at the end of the tax year	10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary	100	
·	income on your tax return. If a loss, go to line 11	10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))	11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as		
	an ordinary loss on your tax return	12	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:		
а	Enter the fair market value of the stock on the date of sale or disposition	13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition	13b	
С	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on		
	your tax return. If a loss, go to line 14	13c	
14 a	Enter any unreversed inclusions (as defined in section 1296(d))	14a	
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as		
	an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete		
	line 14c	14b	
С	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount		
	on your tax return according to the rules generally applicable for losses provided elsewhere in the Code and		
	regulations	14c	
	Note. See instructions in case of multiple sales or dispositions.		

		/	
5 a	Enter your total distributions from the section 1291 fund during the current tax year with respect to the		
	applicable stock. If the holding period of the stock began in the current tax year, see instructions	15a	41.00
b	Enter the total distributions (reduced by the portions of such distributions that were excess distributions but		
	not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for		
	each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period		
	before the current tax year)	15b	2.00
С	Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.)	15c	0.67
d	Multiply line 15c by 125% (1.25)	15d	0.84
е	Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the		
	applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of		
	stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one		
	distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution		
	on your income tax return	15e	40.16
f	Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain,		
	complete line 16. If a loss, show it in brackets and do not complete line 16	15f	61.00
6 a	If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and		
	disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess		
	distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax		
	year.		
b	Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the		
-	foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income.	16b	
С	Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the		
·	current tax year and pre-PFIC years). (See instructions.)	16c	
d	Foreign tax credit. (See instructions.)	16d	
e	Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.)		
f	Determine interest on each net increase in tax determined on line 16e using the rates and methods of section	100	
'	6621. Enter the aggregate amount of interest here. (See instructions.)	16f	

Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election. Complete lines 25 and 26 only if there is a partial termination of the section 1294 election.

	(i)	(ii)	(iii)	(iv)	(v)	(vi)
17 Tax year of outstanding						
election						
18 Undistributed earnings to						
which the election relates						
19 Deferred tax						
20 Interest accrued on deferred						
tax (line 19) as of the filing date						
21 Event terminating election						
22 Earnings distributed or						
deemed distributed during the						
tax year						
23 Deferred tax due with this						
return						
24 Accrued interest due with this						
return						
25 Deferred tax outstanding after						
partial termination of election						
26 Interest accrued after partial						
termination of election						

Form **8621** (Rev. 12-2014)

Form 8621

(Rev. December 2014) Department of the Treasury Internal Revenue Service

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

▶ Information about Form 8621 and its separate instructions is at www.irs.gov/form8621.

OMB No. 1545-1002

Attachment Sequence No. **69**

Name of shareholder	Identifying number (see instructions)						
AMERICAN JEWISH COMMITTEE	13-5563393						
Number, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other tax year						
165 EAST 56TH STREET	beginning and ending .						
City or town, state, and ZIP code or country							
NEW YORK, NY 10022-2709							
Check type of shareholder filing the return: Individual Corporation Name of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Partnership S Corporation X Nongrantor Trust Estate Employer identification number (if any)						
GRESHAM CAPITAL CLO IV B.V.	N/A						
Address (Enter number, street, city or town, and country.)	Reference ID number (see instructions)						
RIVIERSTAETE BUILDING, AMSTELDIJK 166	AJCGCCIVBV						
1079 LH AMSTERDAM, THE NETHERLANDS	Tax year of PFIC or QEF: calendar year 2014 or other tax year						
	beginning and						
	ending .						
Part I Summary of Annual Information (See instructions.)							
Provide the following information with respect to all shares of the PFIC held by the shares o	the shareholder:						
4. Decembring of each along of shows held by the charabelders. 173 DT OUG	CDD CMAMDMENT 1						
Description of each class of shares held by the shareholder: VARIOUS VARIOUS	- SEE STATEMENT I						
Check if shares jointly owned with spouse.							
2 Date shares acquired during the taxable year, if applicable: VARIOUS	- SEE STATEMENT 1						
3 Number of shares held at the end of the taxable year:VARIOUS	- SEE STATEMENT 1						
4 Value of shares held at the end of the taxable year (check the appropriate							
(a) X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-1							
(e) If more than \$200,000, list value:							
5 Type of PFIC and amount of any excess distribution or gain treated as an e	excess distribution						
under section 1291, inclusion under section 1293, or inclusion or deducti							
(a) X Section 1291 \$ VARIOUS - SEE STATEMENT	1						
(b) Section 1293 (Qualified Electing Fund) \$							
(c) Section 1296 (Mark to Market) \$							
Part II Elections (See instructions.)							
A Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to the	treat the PEIC as a OEE. Complete lines 6a through 7c of Part III						
B Election To Extend Time For Payment of Tax. I, a shareholder of a QE	· · · · · · · · · · · · · · · · · · ·						
Note: If any portion of line 6a or line 7a of Part III is includible under sec	,						
and 1294(f) and the related regulations for events that terminate this ele	ection.						
C Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elemeaning of section 1296(e). Complete Part IV.	ect to mark-to-market the PFIC stock that is marketable within the						
Deemed Sale Election. I, a shareholder on the first day of a PFIC's first interest in the PFIC. Enter gain or loss on line 15f of Part V.	t tax year as a QEF, elect to recognize gain on the deemed sale of my						
Deemed Dividend Election. I, a shareholder on the first day of a PFIC's elect to treat an amount equal to my share of the post-1986 earnings a line 15e of Part V. If the excess distribution is greater than zero, also cor	and profits of the CFC as an excess distribution. Enter this amount on						
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder treat as an excess distribution the gain recognized on the deemed sale	of a former PFIC or a PFIC to which section 1297(d) applies, elect to						
under section 1297(a). Enter gain on line 15f of Part V.							
Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I Regulations section 1.1297-3(a), elect to make a deemed dividend electock of the Section 1297(e) PFIC includes the CFC qualification date, distribution on line 15e, Part V. If the excess distribution is greater than 2	as defined in Regulations section 1297(e) PFIC. My holding period in the as defined in Regulations section 1.1297-3(d). Enter the excess						
H Deemed Dividend Election With Respect to a Former PFIC. I, a shareh 1.1298-3(a), elect to make a deemed dividend election with respect to includes the termination date, as defined in Regulations section 1.1298 distribution is greater than zero, also complete line 16, Part V.	the former PFIC. My holding period in the stock of the former PFIC						

Form 8621 (Rev. 12-2014)

Part	Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a th	hrough 7c. If you are making	
	Election B, also complete lines 8a through 9c. (See instructions.)		
6a	Enter your pro rata share of the ordinary earnings of the QEF 6a		
b	Enter the portion of line 6a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income	6c	
7a	Enter your pro rata share of the total net capital gain of the QEF	_	
b	Enter the portion of line 7a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount in Part II of the		
	Schedule D used for your income tax return. (See instructions.)	7c	
8a	Add lines 6c and 7c	8a	
b	Enter the total amount of cash and the fair market value of other property distributed		
	or deemed distributed to you during the tax year of the QEF. (See instructions.) 8b	_	
С	Enter the portion of line 8a not already included in line 8b that is attributable to		
	shares in the QEF that you disposed of, pledged, or otherwise transferred during the		
	tax year	_	
d	Add lines 8b and 8c	8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible in income under section		
	951, you may make Election B with respect to the amount on line 8e.		
9a	Enter the total tax for the tax year (See instructions.)	-	
b	Enter the total tax for the tax year determined without regard to the amount		
	entered on line 8e	-	
С	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by	0-	
Part	making Election B. See instructions	9c	_
10 a	Enter the fair market value of your PFIC stock at the end of the tax year	10a	
b	Enter your adjusted basis in the stock at the end of the tax year	10b	_
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary	100	_
·	income on your tax return. If a loss, go to line 11	10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))	11	_
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as		_
	an ordinary loss on your tax return	12	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:	12	_
а	Enter the fair market value of the stock on the date of sale or disposition	13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition	13b	_
С	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on		_
	your tax return. If a loss, go to line 14	13c	
14 a	Enter any unreversed inclusions (as defined in section 1296(d))	14a	_
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as		
	an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete		
	line 14c	14b	
С	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount		
	on your tax return according to the rules generally applicable for losses provided elsewhere in the Code and		
	regulations	14c	
	Note. See instructions in case of multiple sales or dispositions.		

Form 8621 (Rev. 12-2014) Page 3 Distributions From and Dispositions of Stock of a Section 1291 Fund (See instructions.) SEE STATEMENT 1 Part V Complete a separate Part V for each excess distribution and disposition (see instructions). 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the 15a applicable stock. If the holding period of the stock began in the current tax year, see instructions Enter the total distributions (reduced by the portions of such distributions that were excess distributions but b not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b 15c Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) 15d d Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution 15e Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income. 16b Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). (See instructions.) 16d 16e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. (See instructions.) Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Part VI Complete a separate column for each outstanding election. Complete lines 25 and 26 only if there is a partial termination of the section 1294 election. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates . . 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election. . 22 Earnings distributed or deemed distributed during the

Form **8621** (Rev. 12-2014)

tax year

23 Deferred tax due with this return

24 Accrued interest due with this return

25 Deferred tax outstanding after partial termination of election

26 Interest accrued after partial termination of election

PARTNERSHIP NAME: PARTNERSHIP EIN: INVESTOR NAME: INVESTOR EIN: ANCHORAGE CAPITAL PARTNERS, LP 20-0059325 AMERICAN JEWISH COMMITTEE 13-5563393

PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICS"):
DURING THE 2014 TAX YEAR, ANCHORAGE CAPITAL PARTNERS, LP INVESTED IN PFICS. THESE PFICS
WILL BE GOVERNED UNDER THE EXCESS DISTRIBUTION REGIME PER IRC SECTION 1291.

YOU WILL NEED THE BELOW INFORMATION TO REPORT ON FORM 8621, "RETURN BY A SHAREHOLDER OF A PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND."

PLEASE CONSULT YOUR TAX ADVISOR.

NAME:		GR	ESHAM CAPITAL CLO IV	B.V.	GRESHAM CAPITAL CLO I	IV B.V.
ADDRESS:			RIVIERSTAETE BUILDING AMSTELDIJK 166 079 LH AMSTERDAM, TH		RIVIERSTAETE BUILDI AMSTELDIJK 166 1079 LH AMSTERDAM,	.
PFIC EIN: PFIC TAX YEAR:		JAI	NETHERLANDS N/A NUARY 1, 2014 - DECEME 31, 2014	BER	NETHERLANDS N/A JANUARY 1, 2014 - DECEI 31, 2014	MBER
PART I SUMMARY OF ANNUAL INFORMATION				\neg		
LINE 1:	DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER		SUBORDINATED NOTES		SUBORDINATED NOTI	FS
LINE 2:	DATE SHARES ACQUIRED DURING THE TAXABLE YEAR. IF APPLICABLE		N/A		N/A	I
LINE 2.	NUMBER OF SHARES HEI D AT THE END OF THE TAXABLE YEAR			,694	IN/A	824
LINE 4:	VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR	\$		603	s	293
LINE 5:	TYPE OF PFIC	ľ	SECTION 1291		SECTION 1291	
LINE 5A/B/C:	INCOME INCLUSION	\$		337	\$	139
PART V DISTRIBUTIONS FROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND						
	DATE OF ACQUISITION		2/14/2012		10/24/2012	
LINE 15A (NOTE 1): LINE 15B:	TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEEDING THE	э		.	\$	- 1
LINE ISB.	CURRENT TAX YEAR	\$		-	\$	-
LINE 15E:	EXCESS DISTRIBUTION	\$		- 1	\$	- 1
	DATE OF SALE		1/1/2014 - DEEMED SALE		1/1/2014 - DEEMED SA	
	COST BASIS	\$		97	\$	72
LINE 15F (NOTE 2):	GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER	\$		337	\$	139
	SECTION 1291 FUND LOSS FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER	١.				
1	SECTION 1291 FUND	\$		-	\$	-

⁽¹⁾ THESE AMOUNTS ARE INCLUDED IN LINE 6A OF YOUR SCHEDULE K-1. PLEASE CONSULT YOUR TAX ADVISOR.

(2) THE GAIN AMOUNTS ARE INCLUDED IN LINE 6A OF YOUR SCHEDULE K-1; LOSS AMOUNTS ARE INCLUDED IN LINE 9A OF YOUR SCHEDULE K-1. PLEASE CONSULT YOUR TAX ADVISOR.

(Rev. December 2014) Department of the Treasury Internal Revenue Service

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

▶ Information about Form 8621 and its separate instructions is at www.irs.gov/form8621.

OMB No. 1545-1002

Attachment Sequence No. 69

lame of shareholder	Identifying number (see instructions)					
AMERICAN JEWISH COMMITTEE	13-5563393					
lumber, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other tax year					
165 EAST 56TH STREET	beginning and ending					
City or town, state, and ZIP code or country						
NEW YORK, NY 10022-2709						
Check type of shareholder filing the return: Individual X Corporation	Partnership S Corporation Nongrantor Trust Estate					
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Employer identification number (if any)					
HARVEST CLO I.S.A Address (Enter number, street, city or town, and country.)	N/A Reference ID number (see instructions)					
C/O TMF LUXEMBOURG, 46A AVENUE, J.F. KENNEDY	AJCHCISA					
L-1855 LUXEMBOURG	Tax year of PFIC or QEF: calendar year 2014 or other tax year					
1 1000 Londingoone	beginning					
	ending .					
Part I Summary of Annual Information (See instructions.)						
Provide the following information with respect to all shares of the PFIC held by the	he shareholder:					
1 Description of each class of shares held by the shareholder: CLASS F	SUBORDINATED NOTES					
Check if shares jointly owned with spouse.						
,						
2 Date shares acquired during the taxable year, if applicable: N/A						
1220						
Number of shares held at the end of the taxable year:1339						
4 Value of shares held at the end of the taxable year (check the appropriate I	oox if applicable):					
(a) X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-1						
(e) If more than \$200,000, list value:						
5 Type of PFIC and amount of any excess distribution or gain treated as an e	xcess distribution					
under section 1291, inclusion under section 1293, or inclusion or deduction	on under section 1296:					
W						
(a) X Section 1291 \$ 61.00						
(b) Section 1293 (Qualified Electing Fund) \$						
(c) Section 1296 (Mark to Market) \$						
Part II Elections (See instructions.)						
A Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to t	reat the PFIC as a QEF. Complete lines 6a through 7c of Part III.					
B Election To Extend Time For Payment of Tax. I, a shareholder of a QE earnings and profits of the QEF until this election is terminated. Complete	F, elect to extend the time for payment of tax on the undistributed					
Note: If any portion of line 6a or line 7a of Part III is includible under sect						
and 1294(f) and the related regulations for events that terminate this ele-	ction.					
Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elemeaning of section 1296(e). Complete Part IV.	ct to mark-to-market the PFIC stock that is marketable within the					
Deemed Sale Election. I, a shareholder on the first day of a PFIC's first interest in the PFIC. Enter gain or loss on line 15f of Part V.	tax year as a QEF, elect to recognize gain on the deemed sale of my					
Deemed Dividend Election. I, a shareholder on the first day of a PFIC's elect to treat an amount equal to my share of the post-1986 earnings a line 15e of Part V. If the excess distribution is greater than zero, also con	nd profits of the CFC as an excess distribution. Enter this amount on					
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder treat as an excess distribution the gain recognized on the deemed sale under section 1297(a). Enter gain on line 15f of Part V.						
G Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, Regulations section 1.1297-3(a), elect to make a deemed dividend ele stock of the Section 1297(e) PFIC includes the CFC qualification date, distribution on line 15e, Part V. If the excess distribution is greater than 2	ction with respect to the Section 1297(e) PFIC. My holding period in the as defined in Regulations section 1.1297-3(d). Enter the excess					
H Deemed Dividend Election With Respect to a Former PFIC. I, a shareh 1.1298-3(a), elect to make a deemed dividend election with respect to includes the termination date, as defined in Regulations section 1.1298-distribution is greater than zero, also complete line 16, Part V.	older of a former PFIC, within the meaning of Regulations section the former PFIC. My holding period in the stock of the former PFIC					

Form 8621 (Rev. 12-2014)

Part	Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a th	hrough 7c. If you are making	
	Election B, also complete lines 8a through 9c. (See instructions.)		
6a	Enter your pro rata share of the ordinary earnings of the QEF 6a		
b	Enter the portion of line 6a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income	6c	
7a	Enter your pro rata share of the total net capital gain of the QEF	_	
b	Enter the portion of line 7a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount in Part II of the		
	Schedule D used for your income tax return. (See instructions.)	7c	
8a	Add lines 6c and 7c	8a	
b	Enter the total amount of cash and the fair market value of other property distributed		
	or deemed distributed to you during the tax year of the QEF. (See instructions.) 8b	_	
С	Enter the portion of line 8a not already included in line 8b that is attributable to		
	shares in the QEF that you disposed of, pledged, or otherwise transferred during the		
	tax year	_	
d	Add lines 8b and 8c	8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible in income under section		
	951, you may make Election B with respect to the amount on line 8e.		
9a	Enter the total tax for the tax year (See instructions.)	-	
b	Enter the total tax for the tax year determined without regard to the amount		
	entered on line 8e	-	
С	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by	0-	
Part	making Election B. See instructions	9c	_
10 a	Enter the fair market value of your PFIC stock at the end of the tax year	10a	
b	Enter your adjusted basis in the stock at the end of the tax year	10b	_
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary	100	_
·	income on your tax return. If a loss, go to line 11	10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))	11	_
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as		_
	an ordinary loss on your tax return	12	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:	12	_
а	Enter the fair market value of the stock on the date of sale or disposition	13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition	13b	_
С	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on		_
	your tax return. If a loss, go to line 14	13c	
14 a	Enter any unreversed inclusions (as defined in section 1296(d))	14a	_
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as		
	an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete		
	line 14c	14b	
С	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount		
	on your tax return according to the rules generally applicable for losses provided elsewhere in the Code and		
	regulations	14c	
	Note. See instructions in case of multiple sales or dispositions.		

Form 8621 (Rev. 12-2014) Page 3 Distributions From and Dispositions of Stock of a Section 1291 Fund (See instructions.) Part V Complete a **separate** Part V for each excess distribution and disposition (see instructions). 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the 0.00 15a applicable stock. If the holding period of the stock began in the current tax year, see instructions Enter the total distributions (reduced by the portions of such distributions that were excess distributions but b not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period 0.00 before the current tax year) 15b 15c Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) 15d d Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution 15e Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, 61.00 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income. 16b Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). (See instructions.) 16d 16e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. (See instructions.) Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Part VI Complete a separate column for each outstanding election. Complete lines 25 and 26 only if there is a partial termination of the section 1294 election. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates . . 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election. . 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return 24 Accrued interest due with this

Form 8621

(Rev. December 2014) Department of the Treasury Internal Revenue Service

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

▶ Information about Form 8621 and its separate instructions is at www.irs.gov/form8621.

OMB No. 1545-1002

Name of shareholder	Identifying number (see instructions)					
AMERICAN JEWISH COMMITTEE	13-5563393					
Number, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other tax year					
165 EAST 56TH STREET	beginning and ending .					
City or town, state, and ZIP code or country						
NEW YORK, NY 10022-2709						
Check type of shareholder filing the return: Individual Corporation Name of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Partnership S Corporation X Nongrantor Trust Estate Employer identification number (if any)					
MAV 2 LIQUIDATION TRUST	N/A					
Address (Enter number, street, city or town, and country.)	Reference ID number (see instructions)					
COMPUTERSHRE TRUST COMPANY OF CANADA, IN ITS CAPACITY	AJCMV2					
AS ISSUER TRUSTEE OF MASTER ASSET VEHICLE II 100 UNIVERSITY AVENUE, 8TH FLOOR, TORONTO,	Tax year of PFIC or QEF: calendar year 2014 or other tax year beginning and					
ONTARIO M5J 2Y1, CANADA	ending .					
Part I Summary of Annual Information (See instructions.)						
Provide the following information with respect to all shares of the PFIC held by the	e shareholder:					
Description of each class of shares held by the shareholder: Check if shares jointly owned with spouse. Date shares acquired during the taxable year, if applicable: VARIOUS S						
3 Number of shares held at the end of the taxable year:VARIOUS S	SEE ATTACHMENT 1					
4 Value of shares held at the end of the taxable year (check the appropriate bota) \$0-50,000 (b) X \$50,001-100,000 (c) \$100,001-15 (e) If more than \$200,000, list value:	• • •					
5 Type of PFIC and amount of any excess distribution or gain treated as an excunder section 1291, inclusion under section 1293, or inclusion or deduction						
(a) X Section 1291 \$ VARIOUS SEE ATTACHMENT 1						
(b) Section 1293 (Qualified Electing Fund) \$						
(c) Section 1296 (Mark to Market) \$						
Part II Elections (See instructions.)						
A Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to tree	and the DEIC on a OEE Complete lines for through 7s of Port III					
B Election To Freat the Fric as a QEF., a shareholder of a PFIC, election to Extend Time For Payment of Tax. I, a shareholder of a QEF earnings and profits of the QEF until this election is terminated. Complete	, elect to extend the time for payment of tax on the undistributed					
Note: If any portion of line 6a or line 7a of Part III is includible under section and 1294(f) and the related regulations for events that terminate this elect						
C Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, election meaning of section 1296(e). Complete Part IV.	t to mark-to-market the PFIC stock that is marketable within the					
D Deemed Sale Election. I, a shareholder on the first day of a PFIC's first t interest in the PFIC. Enter gain or loss on line 15f of Part V.	ax year as a QEF, elect to recognize gain on the deemed sale of my					
Deemed Dividend Election. I, a shareholder on the first day of a PFIC's fi elect to treat an amount equal to my share of the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero, also compared to the post-1986 earnings and line 15e of Part V. If the excess distribution is greater than zero earnings and line 15e of Part V. If the excess distribution is greater than zero earnings and line 15e of Part V. If the excess distribution is greater than zero earnings and line 15e of Part V. If the excess distribution is greater than zero earnings and line 15e of Part V. If the excess distribution is greater than zero earnings and line 15e of Part V. If t	d profits of the CFC as an excess distribution. Enter this amount on					
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of treat as an excess distribution the gain recognized on the deemed sale of under section 1297(a). Enter gain on line 15f of Part V.						
G Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a Regulations section 1.1297-3(a), elect to make a deemed dividend elect stock of the Section 1297(e) PFIC includes the CFC qualification date, at distribution on line 15e, Part V. If the excess distribution is greater than ze	tion with respect to the Section 1297(e) PFIC. My holding period in the self-ined in Regulations section 1.1297-3(d). Enter the excess					
H Deemed Dividend Election With Respect to a Former PFIC. I, a sharehod 1.1298-3(a), elect to make a deemed dividend election with respect to the includes the termination date, as defined in Regulations section 1.1298-3 distribution is greater than zero, also complete line 16, Part V.	lder of a former PFIC, within the meaning of Regulations section ne former PFIC. My holding period in the stock of the former PFIC					

Form 8621 (Rev. 12-2014)

Part	Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a th	nrough 7c. If you are ma	king
	Election B, also complete lines 8a through 9c. (See instructions.)		
6a	Enter your pro rata share of the ordinary earnings of the QEF 6a		
b	Enter the portion of line 6a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income	6c	
7a	Enter your pro rata share of the total net capital gain of the QEF		
b	Enter the portion of line 7a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount in Part II of the		
	Schedule D used for your income tax return. (See instructions.)	7c	
8a	Add lines 6c and 7c	8a	
b	Enter the total amount of cash and the fair market value of other property distributed		
	or deemed distributed to you during the tax year of the QEF. (See instructions.) 8b		
С	Enter the portion of line 8a not already included in line 8b that is attributable to		
	shares in the QEF that you disposed of, pledged, or otherwise transferred during the		
	tax year		
d	Add lines 8b and 8c	8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible in income under section		
	951, you may make Election B with respect to the amount on line 8e.		
9a	Enter the total tax for the tax year (See instructions.)		
b	Enter the total tax for the tax year determined without regard to the amount		
	entered on line 8e		
С	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by	0-	
Part	making Election B. See instructions	9c	
10 a	Enter the fair market value of your PFIC stock at the end of the tax year	10a	
b	Enter your adjusted basis in the stock at the end of the tax year	10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary	100	
·	income on your tax return. If a loss, go to line 11	10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))	11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as		
	an ordinary loss on your tax return	12	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:		
а	Enter the fair market value of the stock on the date of sale or disposition	13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition	13b	
С	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on		
	your tax return. If a loss, go to line 14	13c	
14 a	Enter any unreversed inclusions (as defined in section 1296(d))	14a	
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as		
	an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete		
	line 14c	14b	
С	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount		
	on your tax return according to the rules generally applicable for losses provided elsewhere in the Code and		
	regulations	14c	
	Note. See instructions in case of multiple sales or dispositions.		

Form 8621 (Rev. 12-2014) Page 3 Distributions From and Dispositions of Stock of a Section 1291 Fund (See instructions.) SEE ATTACHMENT Part V Complete a **separate** Part V for each excess distribution and disposition (see instructions). 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the 15a applicable stock. If the holding period of the stock began in the current tax year, see instructions Enter the total distributions (reduced by the portions of such distributions that were excess distributions but b not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b 15c Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) 15d d Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution 15e Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income..... 16b Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). (See instructions.) 16d 16e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. (See instructions.) Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 25 and 26 only if there is a partial termination of the section 1294 election.

		(i)	(ii)	(iii)	(iv)	(v)	(vi)
17	Tax year of outstanding						
	election						
18	Undistributed earnings to						
	which the election relates						
19	Deferred tax						
20	Interest accrued on deferred						
	tax (line 19) as of the filing date						
21	Event terminating election.						
22	Earnings distributed or						
	deemed distributed during the						
	tax year						
23	Deferred tax due with this						
	return						
24	Accrued interest due with this						
	return						
25	Deferred tax outstanding after						
	partial termination of election						
26	Interest accrued after partial						
	termination of election						

ANCHORAGE CAPITAL PARTNERS, LP 20-0059325 AMERICAN JEWISH COMMITTEE 13-5563393 PARTNERSHIP NAME: PARTNERSHIP EIN: INVESTOR NAME: INVESTOR EIN:

PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICS"):
DURING THE 2014 TAX YEAR, ANCHORAGE CAPITAL PARTNERS, LP INVESTED IN PFICS. THESE PFICS
WILL BE GOVERNED UNDER THE EXCESS DISTRIBUTION REGIME PER IRC SECTION 1291.

YOU WILL NEED THE BELOW INFORMATION TO REPORT ON FORM 8621, "RETURN BY A SHAREHOLDER OF A PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND."

PLEASE CONSULT YOUR TAX ADVISOR.

NAME:		MAV 2 LIQUIDATION TRUST	MAV 2 LIQUIDATION TRUST	MAV 2 LIQUIDATION TRUST
ADDRESS:		COMPUTERSHARE TRUST COMPANY OF CANADA, IN ITS CAPACITY AS ISSUER TRUSTEE OF MASTER ASSET VEHICLE II 100 UNIVERSITY AVENUE, 8TH FLOOR TORONTO, ONTARIO M5J 2Y1	COMPUTERSHARE TRUST COMPANY OF CANADA, IN ITS CAPACITY AS ISSUER TRUSTEE OF MASTER ASSET VEHICLE II 100 UNIVERSITY AVENUE, 8TH FLOOR TORONTO, ONTARIO MSJ 2Y1	COMPUTERSHARE TRUST COMPANY OF CANADA, IN ITS CAPACITY AS ISSUER TRUSTEE OF MASTER ASSET VEHICLE II 100 UNIVERSITY AVENUE, 8TH FLOOR TORONTO, ONTARIO M5J 2Y1
PFIC EIN:		N/A	N/A	N/A
		JANUARY 1, 2014 - DECEMBER	JANUARY 1, 2014 - DECEMBER	JANUARY 1, 2014 - DECEMBER
PFIC TAX YEAR:		31, 2014	31, 2014	31, 2014
PART I SUMMARY OF ANNU	JAL INFORMATION			
LINE 1:	DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER	LIQUIDATION TRUST UNITS	LIQUIDATION TRUST UNITS	LIQUIDATION TRUST UNITS
LINE 2: LINE 3: LINE 4: LINE 5: LINE 5A/B/C:	DATE SHARES ACQUIRED DURING THE TAXABLE YEAR, IF APPLICABLE NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR TYPE OF PFIC INCOME INCLUSION	2/19/2014 \$ 256 \$ SECTION 1291 \$ -	2/19/2014 3 2,514 5 \$ 57 SECTION 1291 \$ -	2/19/2014 \$ 14,685 \$ 333 \$ECTION 1291 \$ -
PART V DISTRIBUTIONS FR	OM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND	l *	T .	l ·
	DATE OF ACQUISITION TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEEDING THE CURRENT TAX YEAR	2/19/2014 \$ - \$ -	2/19/2014 \$ - \$ -	2/19/2014 \$ - \$ -
LINE 15E:	EXCESS DISTRIBUTION DATE OF SALE COST BASIS	\$ - \$ -	\$ - \$ -	\$ - \$ -
LINE 15F (NOTE 2):	GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND LOSS FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND	\$ - \$	\$ - \$ -	\$ - \$ -

⁽¹⁾ THESE AMOUNTS ARE INCLUDED IN LINE 6A OF YOUR SCHEDULE K-1. PLEASE CONSULT YOUR TAX ADVISOR.

PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICS"):
DURING THE 2014 TAX YEAR, ANCHORAGE CAPITAL PARTNERS, LP INVESTED IN PFICS. THESE PFICS
WILL BE GOVERNED UNDER THE EXCESS DISTRIBUTION REGIME PER IRC SECTION 1291.

YOU WILL NEED THE BELOW INFORMATION TO REPORT ON FORM 8621, "RETURN BY A SHAREHOLDER OF A PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND."

PLEASE CONSULT YOUR TAX ADVISOR.

					_	
NAME:		MAV 2 LIQUIDATION TRUST		MAV 2 LIQUIDATION TRUST		MAV 2 LIQUIDATION TRUST
ADDRESS:		COMPUTERSHARE TRUST COMPANY OF CANADA, IN ITS CAPACITY AS ISSUER TRUSTEE OF MASTER ASSET VEHICLE II 100 UNIVERSITY AVENUE, 8TH FLOOR TORONTO, ONTARIO M5J 2Y1	E (COMPUTERSHARE TRUST COMPANY OF CANADA, IN ITS CAPACITY AS ISSUER TRUSTE OF MASTER ASSET VEHICLE I 100 UNIVERSITY AVENUE, 8TH FLOOR TORONTO, ONTARIO M5J 2Y1	E I	COMPUTERSHARE TRUST COMPANY OF CANADA, IN ITS CAPACITY AS ISSUER TRUSTEE OF MASTER ASSET VEHICLE II 100 UNIVERSITY AVENUE, 8TH FLOOR TORONTO, ONTARIO M5J 2Y1
PFIC EIN: PFIC TAX YEAR:		N/A JANUARY 1, 2014 - DECEMBER 31, 2014		N/A JANUARY 1, 2014 - DECEMBER 31, 2014	₹	N/A JANUARY 1, 2014 - DECEMBER 31, 2014
	TAL INFORMATION	51, 2014	-	51, 2014	-	51, 2014
PART I SUMMARY OF ANNI LINE 1:	DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER	LIQUIDATION TRUST UNITS		LIQUIDATION TRUST UNITS		LIQUIDATION TRUST UNITS
LINE 2: LINE 3: LINE 4: LINE 5: LINE 5A/B/C:	DATE SHARES ACQUIRED DURING THE TAXABLE YEAR, IF APPLICABLE NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR TYPE OF PFIC INCOME INCLUSION	3/20/2014 \$ \$ SECTION 1291 \$	1 5	SECTION 1291	35	5/29/2014 150 \$ 3 SECTION 1291 \$ -
	NOM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND DATE OF ACQUISITION	3/20/2014	ľ	3/20/2014		5/29/2014
LINE 15A (NOTE 1): LINE 15B:	TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEEDING THE CURRENT TAX YEAR	\$ - \$	5			\$ - \$ -
LINE 15E:	EXCESS DISTRIBUTION DATE OF SALE	-				-
LINE 15F (NOTE 2):	COST BASIS GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND	\$ - \$ -	5	•		\$ - \$ -
	LOSS FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND	\$ -	5	-		\$ -

⁽¹⁾ THESE AMOUNTS ARE INCLUDED IN LINE 6A OF YOUR SCHEDULE K-1. PLEASE CONSULT YOUR TAX ADVISOR.

PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICS"):
DURING THE 2014 TAX YEAR, ANCHORAGE CAPITAL PARTNERS, LP INVESTED IN PFICS. THESE PFICS
WILL BE GOVERNED UNDER THE EXCESS DISTRIBUTION REGIME PER IRC SECTION 1291.

YOU WILL NEED THE BELOW INFORMATION TO REPORT ON FORM 8621, "RETURN BY A SHAREHOLDER OF A PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND."

PLEASE CONSULT YOUR TAX ADVISOR.

NAME:			MA	V 2 LIQUIDATION T	RUST	MA\	/ 2 LIQUIDATION T	RUST
ADDRESS:			CON CAPA OF N	DMPUTERSHARE TI MPANY OF CANADA KCITY AS ISSUER TI MASTER ASSET VEI UNIVERSITY AVENU FLOOR RONTO, ONTARIO M	, IN ITS RUSTEE HICLE II JE, 8TH	COMI CAPAG OF M 100 U	MPUTERSHARE TI PANY OF CANADA CITY AS ISSUER TI ASTER ASSET VEI INIVERSITY AVENU FLOOR DNTO, ONTARIO M	, IN ITS RUSTEE HICLE II JE, 8TH
PFIC EIN:				N/A			N/A	
		,	JANI	JARY 1, 2014 - DEC	EMBER	JANU	ARY 1, 2014 - DEC	EMBER
PFIC TAX YEAR:				31, 2014			31, 2014	
PART I SUMMARY OF ANN	UAL INFORMATION							
LINE 1:	DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER		110	UIDATION TRUST	JNITS	LIGI	UIDATION TRUST I	JNITS
LINE 2:	DATE SHARES ACQUIRED DURING THE TAXABLE YEAR. IF APPLICABLE			N/A			N/A	
LINE 2. LINE 3:	NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR		l	IN/A	21,057		IN/A	23,070
LINE 4:	VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR		\$		480	s		526
LINE 5:	TYPE OF PEIC		ľ	SECTION 1291		ľ	SECTION 1291	
LINE 5A/B/C:	INCOME INCLUSION		\$		-	\$		
PART V DISTRIBUTIONS FF	ROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND		l .					
	DATE OF ACQUISITION		l	12/17/2013			12/17/2013	
LINE 15A (NOTE 1):			\$		-	\$		
LINE 15B:	TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEEDING THE		\$		-	\$		
LINE 15E:	CURRENT TAX YEAR EXCESS DISTRIBUTION		,					
LINE 15E:	DATE OF SALE		l »		-	ð		
	COST BASIS		s			s		
LINE 15F (NOTE 2):	GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER		Ľ			l *		
	SECTION 1291 FUND		Þ		-	\$		- 1
	LOSS FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND		\$		-	\$		-

⁽¹⁾ THESE AMOUNTS ARE INCLUDED IN LINE 6A OF YOUR SCHEDULE K-1. PLEASE CONSULT YOUR TAX ADVISOR.

PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICS"):
DURING THE 2014 TAX YEAR, ANCHORAGE CAPITAL PARTNERS, LP INVESTED IN PFICS. THESE PFICS
WILL BE GOVERNED UNDER THE EXCESS DISTRIBUTION REGIME PER IRC SECTION 1291.

YOU WILL NEED THE BELOW INFORMATION TO REPORT ON FORM 8621, "RETURN BY A SHAREHOLDER OF A PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND."

PLEASE CONSULT YOUR TAX ADVISOR.

		•	
NAME:		MAV 2 LIQUIDATION TRUST	MAV 2 LIQUIDATION TRUST
ADDRESS:		COMPUTERSHARE TRUST COMPANY OF CANADA, IN ITS CAPACITY AS ISSUER TRUSTEE OF MASTER ASSET VEHICLE II 100 UNIVERSITY AVENUE, 8TH FLOOR TORONTO, ONTARIO M5J 2Y1	COMPUTERSHARE TRUST COMPANY OF CANADA, IN ITS CAPACITY AS ISSUER TRUSTEE OF MASTER ASSET VEHICLE II 100 UNIVERSITY AVENUE, 8TH FLOOR TORONTO, ONTARIO M5J 2Y1
PFIC EIN: PFIC TAX YEAR:		N/A JANUARY 1, 2014 - DECEMBER 31, 2014	N/A JANUARY 1, 2014 - DECEMBER 31, 2014
PART I SUMMARY OF ANN	UAL INFORMATION		
LINE 1:	DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER	LIQUIDATION TRUST UNITS	LIQUIDATION TRUST UNITS
LINE 2: LINE 3: LINE 4: LINE 5: LINE 5A/B/C:	DATE SHARES ACQUIRED DURING THE TAXABLE YEAR, IF APPLICABLE NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR TYPE OF PFIC INCOME INCLUSION	N/A 2,890 \$ 66 SECTION 1291	N/A 1,232 \$ 28 SECTION 1291 \$ -
	ROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND	ľ	ľ
	DATE OF ACQUISITION TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEEDING THE CURRENT TAX YEAR	12/17/2013 \$ - \$ -	12/17/2013 \$ - \$ -
LINE 15E:	EXCESS DISTRIBUTION DATE OF SALE COST BASIS	\$ - \$ -	\$ - \$ -
LINE 15F (NOTE 2):	GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND LOSS FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND	\$ - \$	\$ - \$

⁽¹⁾ THESE AMOUNTS ARE INCLUDED IN LINE 6A OF YOUR SCHEDULE K-1. PLEASE CONSULT YOUR TAX ADVISOR.

Form 8621

(Rev. December 2014) Department of the Treasury Internal Revenue Service

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

▶ Information about Form 8621 and its separate instructions is at www.irs.gov/form8621.

OMB No. 1545-1002

lame of shareholder Identifying number (see instructions)					
AMERICAN JEWISH COMMITTEE	13-5563393				
lumber, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other tax year				
165 EAST 56TH STREET	beginning and ending .				
City or town, state, and ZIP code or country					
NEW YORK, NY 10022-2709					
Check type of shareholder filing the return: Individual Corporation lame of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Partnership S Corporation Nongrantor Trust Estate Employer identification number (if any)				
	98-1097222				
NEW COTAI PARTICIPATION CORP. Address (Enter number, street, city or town, and country.)	Reference ID number (see instructions)				
COMMERCE HOUSE, WICKHAMS CY 1	AJCNCPC				
PO BOX 3140, ROAD TOWN, TORTOLA VG1110	Tax year of PFIC or QEF: calendar year 2014 or other tax year				
BRITISH VIRGINA ISLANDS	beginning and				
	ending .				
Part I Summary of Annual Information (See instructions.)					
Provide the following information with respect to all shares of the PFIC held by the	e shareholder:				
1 Description of each class of shares held by the shareholder: CLASS B	SHARES				
Check if shares jointly owned with spouse.					
2 Date shares acquired during the taxable year, if applicable: N/A					
2 Date shares acquired during the taxable year, if applicable: N/A					
3 Number of shares held at the end of the taxable year:0					
4 Value of shares held at the end of the taxable year (check the appropriate be	ox, if applicable):				
(a) X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-15	50,000 (d) \$150,001-200,000				
(e) If more than \$200,000, list value:					
 Type of PFIC and amount of any excess distribution or gain treated as an ex under section 1291, inclusion under section 1293, or inclusion or deductio (a) X Section 1291 \$ 0.00 Section 1293 (Qualified Electing Fund) \$ Section 1296 (Mark to Market) \$ Section 1296 (Mark to Market) \$ Section 1296 (Mark to Market) 					
(·/					
Part II Elections (See instructions.)					
B Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to tree Election To Extend Time For Payment of Tax. I, a shareholder of a QEF earnings and profits of the QEF until this election is terminated. Complete	, elect to extend the time for payment of tax on the undistributed				
Note: If any portion of line 6a or line 7a of Part III is includible under section and 1294(f) and the related regulations for events that terminate this electrical section.					
C Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, election meaning of section 1296(e). Complete Part IV.	t to mark-to-market the PFIC stock that is marketable within the				
Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tinterest in the PFIC. Enter gain or loss on line 15f of Part V.	ax year as a QEF, elect to recognize gain on the deemed sale of my				
Deemed Dividend Election. I, a shareholder on the first day of a PFIC's f elect to treat an amount equal to my share of the post-1986 earnings an line 15e of Part V. If the excess distribution is greater than zero, also comp	d profits of the CFC as an excess distribution. Enter this amount on				
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of treat as an excess distribution the gain recognized on the deemed sale of under section 1297(a). Enter gain on line 15f of Part V.					
Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a Regulations section 1.1297-3(a), elect to make a deemed dividend elect stock of the Section 1297(e) PFIC includes the CFC qualification date, a distribution on line 15e, Part V. If the excess distribution is greater than zero.	tion with respect to the Section 1297(e) PFIC. My holding period in the is defined in Regulations section 1.1297-3(d). Enter the excess				
H Deemed Dividend Election With Respect to a Former PFIC. I, a sharehord 1.1298-3(a), elect to make a deemed dividend election with respect to the includes the termination date, as defined in Regulations section 1.1298-3 distribution is greater than zero, also complete line 16, Part V.	older of a former PFIC, within the meaning of Regulations section the former PFIC. My holding period in the stock of the former PFIC				

Form 8621 (Rev. 12-2014)

Part	Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a th	nrough 7c. If you are ma	king
	Election B, also complete lines 8a through 9c. (See instructions.)		
6a	Enter your pro rata share of the ordinary earnings of the QEF 6a		
b	Enter the portion of line 6a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income	6c	
7a	Enter your pro rata share of the total net capital gain of the QEF		
b	Enter the portion of line 7a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount in Part II of the		
	Schedule D used for your income tax return. (See instructions.)	7c	
8a	Add lines 6c and 7c	8a	
b	Enter the total amount of cash and the fair market value of other property distributed		
	or deemed distributed to you during the tax year of the QEF. (See instructions.) 8b		
С	Enter the portion of line 8a not already included in line 8b that is attributable to		
	shares in the QEF that you disposed of, pledged, or otherwise transferred during the		
	tax year		
d	Add lines 8b and 8c	8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible in income under section		
	951, you may make Election B with respect to the amount on line 8e.		
9a	Enter the total tax for the tax year (See instructions.)		
b	Enter the total tax for the tax year determined without regard to the amount		
	entered on line 8e		
С	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by	0-	
Part	making Election B. See instructions	9c	
10 a	Enter the fair market value of your PFIC stock at the end of the tax year	10a	
b	Enter your adjusted basis in the stock at the end of the tax year	10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary	100	
·	income on your tax return. If a loss, go to line 11	10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))	11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as		
	an ordinary loss on your tax return	12	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:		
а	Enter the fair market value of the stock on the date of sale or disposition	13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition	13b	
С	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on		
	your tax return. If a loss, go to line 14	13c	
14 a	Enter any unreversed inclusions (as defined in section 1296(d))	14a	
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as		
	an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete		
	line 14c	14b	
С	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount		
	on your tax return according to the rules generally applicable for losses provided elsewhere in the Code and		
	regulations	14c	
	Note. See instructions in case of multiple sales or dispositions.		

Form 8621 (Rev. 12-2014) Page 3 Distributions From and Dispositions of Stock of a Section 1291 Fund (See instructions.) Part V Complete a **separate** Part V for each excess distribution and disposition (see instructions). 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the 0.00 15a applicable stock. If the holding period of the stock began in the current tax year, see instructions Enter the total distributions (reduced by the portions of such distributions that were excess distributions but b not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b 15c Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) 15d d Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution 0.00 15e Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income. 16b Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). (See instructions.) 16d 16e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. (See instructions.) Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Part VI Complete a separate column for each outstanding election. Complete lines 25 and 26 only if there is a partial termination of the section 1294 election. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates . . 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election. . 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return 24 Accrued interest due with this return

25 Deferred tax outstanding after partial termination of election
 26 Interest accrued after partial termination of election

Form 8621

(Rev. December 2014) Department of the Treasury Internal Revenue Service

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

▶ Information about Form 8621 and its separate instructions is at www.irs.gov/form8621.

OMB No. 1545-1002

Name of shareholder	Identifying number (see instructions)					
AMERICAN JEWISH COMMITTEE	13-5563393					
Number, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other tax year					
165 EAST 56TH STREET	beginning and ending .					
City or town, state, and ZIP code or country						
NEW YORK, NY 10022-2709						
Check type of shareholder filing the return: Individual X Corporation Name of passive foreign investment company (PFIC) or qualified electing fund (QEF)	Partnership S Corporation Nongrantor Trust Estate Employer identification number (if any)					
ROCKWALL CDO II LTD.	N/A					
Address (Enter number, street, city or town, and country.)	Reference ID number (see instructions)					
C/O MAPLES FS LIMITED, PO BOX 1093, BOUNDARY HALL,	AJCRCIIL					
CRICKET SQUARE, GRAND CAYMAN KY1-1102, CAYMAN ISLANDS	Tax year of PFIC or QEF: calendar year 2014 or other tax year					
	beginning and ending .					
Part I Summary of Annual Information (See instructions.)	enuing					
Provide the following information with respect to all shares of the PFIC held by the	e shareholder.					
Trovide the following information with respect to all charge of the first by the	is sharohous.					
1 Description of each class of shares held by the shareholder: VARIOUS	- SEE STATEMENT 1					
Check if shares jointly owned with spouse.						
2 Date shares acquired during the taxable year, if applicable: VARIOUS	- SEE STATEMENT 1					
3 Number of shares held at the end of the taxable year:VARIOUS	- SEE STATEMENT 1					
4 Value of shares held at the end of the taxable year (check the appropriate b	• • •					
(a) X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-15	50,000 (d) \$150,001-200,000					
(e) If more than \$200,000, list value:						
Type of PFIC and amount of any excess distribution or gain treated as an exunder section 1291, inclusion under section 1293, or inclusion or deduction (a) X Section 1291 \$ VARIOUS - SEE STATEMENT 1 (b) Section 1293 (Qualified Electing Fund) \$ (c) Section 1296 (Mark to Market) \$						
Part II Elections (See instructions.)	_					
A Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to tr	reat the PFIC as a QEF. Complete lines 6a through 7c of Part III.					
B Election To Extend Time For Payment of Tax. I, a shareholder of a QEF earnings and profits of the QEF until this election is terminated. <i>Complet</i>						
Note: If any portion of line 6a or line 7a of Part III is includible under secti and 1294(f) and the related regulations for events that terminate this elec						
C Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, election meaning of section 1296(e). Complete Part IV.	ct to mark-to-market the PFIC stock that is marketable within the					
Deemed Sale Election. I, a shareholder on the first day of a PFIC's first interest in the PFIC. Enter gain or loss on line 15f of Part V.	tax year as a QEF, elect to recognize gain on the deemed sale of my					
E Deemed Dividend Election. I, a shareholder on the first day of a PFIC's elect to treat an amount equal to my share of the post-1986 earnings are line 15e of Part V. If the excess distribution is greater than zero, also com	nd profits of the CFC as an excess distribution. Enter this amount on					
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of treat as an excess distribution the gain recognized on the deemed sale of under section 1297(a). Enter gain on line 15f of Part V.	· / · · ·					
G Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, Regulations section 1.1297-3(a), elect to make a deemed dividend election stock of the Section 1297(e) PFIC includes the CFC qualification date, a distribution on line 15e, Part V. If the excess distribution is greater than zero.	ction with respect to the Section 1297(e) PFIC. My holding period in the as defined in Regulations section 1.1297-3(d). <i>Enter the excess</i>					
H Deemed Dividend Election With Respect to a Former PFIC. I, a sharehous 1.1298-3(a), elect to make a deemed dividend election with respect to a includes the termination date, as defined in Regulations section 1.1298-3 distribution is greater than zero, also complete line 16, Part V.	older of a former PFIC, within the meaning of Regulations section the former PFIC. My holding period in the stock of the former PFIC					

Form 8621 (Rev. 12-2014)

Part	Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a th	nrough 7c. If you are ma	king
	Election B, also complete lines 8a through 9c. (See instructions.)		
6a	Enter your pro rata share of the ordinary earnings of the QEF 6a		
b	Enter the portion of line 6a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income	6c	
7a	Enter your pro rata share of the total net capital gain of the QEF		
b	Enter the portion of line 7a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount in Part II of the		
	Schedule D used for your income tax return. (See instructions.)	7c	
8a	Add lines 6c and 7c	8a	
b	Enter the total amount of cash and the fair market value of other property distributed		
	or deemed distributed to you during the tax year of the QEF. (See instructions.) 8b		
С	Enter the portion of line 8a not already included in line 8b that is attributable to		
	shares in the QEF that you disposed of, pledged, or otherwise transferred during the		
	tax year		
d	Add lines 8b and 8c	8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible in income under section		
	951, you may make Election B with respect to the amount on line 8e.		
9a	Enter the total tax for the tax year (See instructions.)		
b	Enter the total tax for the tax year determined without regard to the amount		
	entered on line 8e		
С	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by	0-	
Part	making Election B. See instructions	9c	
10 a	Enter the fair market value of your PFIC stock at the end of the tax year	10a	
b	Enter your adjusted basis in the stock at the end of the tax year	10b	
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary	100	
·	income on your tax return. If a loss, go to line 11	10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))	11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as		
	an ordinary loss on your tax return	12	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:		
а	Enter the fair market value of the stock on the date of sale or disposition	13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition	13b	
С	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on		
	your tax return. If a loss, go to line 14	13c	
14 a	Enter any unreversed inclusions (as defined in section 1296(d))	14a	
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as		
	an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete		
	line 14c	14b	
С	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount		
	on your tax return according to the rules generally applicable for losses provided elsewhere in the Code and		
	regulations	14c	
	Note. See instructions in case of multiple sales or dispositions.		

Form 8621 (Rev. 12-2014) Distributions From and Dispositions of Stock of a Section 1291 Fund (See instructions.) Part V SEE STATEMENT Complete a **separate** Part V for each excess distribution and disposition (see instructions). 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the 15a applicable stock. If the holding period of the stock began in the current tax year, see instructions Enter the total distributions (reduced by the portions of such distributions that were excess distributions but b not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b 15c Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) 15d d Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution 15e Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income. 16b Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). (See instructions.) 16d 16e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. (See instructions.) Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Part VI Complete a separate column for each outstanding election. Complete lines 25 and 26 only if there is a partial termination of the section 1294 election. (i) (ii) (iii) (iv) (v) (vi) election

17 Tax year of outstanding 18 Undistributed earnings to which the election relates . . 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election. . 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return 24 Accrued interest due with this return 25 Deferred tax outstanding after partial termination of election 26 Interest accrued after partial termination of election

PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICS"):
DURING THE 2014 TAX YEAR, ANCHORAGE CAPITAL PARTNERS, LP INVESTED IN PFICS. THESE PFICS
WILL BE GOVERNED UNDER THE EXCESS DISTRIBUTION REGIME PER IRC SECTION 1291.

YOU WILL NEED THE BELOW INFORMATION TO REPORT ON FORM 8621, "RETURN BY A SHAREHOLDER OF A PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND."

PLEASE CONSULT YOUR TAX ADVISOR.

		_		
NAME:		ROCKWALL CDO II LTD.	ROCKWALL CDO II LTD.	ROCKWALL CDO II LTD.
ADDRESS:		C/O MAPLESFS LIMITED, P.O. BOX 1093 BOUNDARY HALL, CRICKET SQUARE GRAND CAYMAN KY1-1102, CAYMAN ISLANDS	C/O MAPLESFS LIMITED, P.O. BOX 1093 BOUNDARY HALL, CRICKET SQUARE GRAND CAYMAN KY1-1102, CAYMAN KY1-1102, CAYMAN ISLANDS	C/O MAPLESFS LIMITED, P.O. BOX 1093 BOUNDARY HALL, CRICKET SOUARE GRAND CAYMAN KY1-1102, CAYMAN KI1-1102,
PFIC EIN:		N/A JANUARY 1, 2014 - DECEMBER 31, 2014	N/A JANUARY 1, 2014 - DECEMBER 31, 2014	N/A JANUARY 1, 2014 - DECEMBER 31, 2014
PART I SUMMARY OF AND	IIIAI INFORMATION			
LINE 1:	DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER	PREFERRED SHARES	PREFERRED SHARES	PREFERRED SHARES
LINE 2: LINE 3: LINE 4: LINE 5: LINE 5A/B/C:	DATE SHARES ACOUIRED DURING THE TAXABLE YEAR, IF APPLICABLE NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR TYPE OF PRIC INCOME INCLUSION	N/A 418 \$ 325 SECTION 1291		SECTION 1291
PART V DISTRIBUTIONS F LINE 15A (NOTE 1):	ROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND DATE OF ACQUISITION TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR	9/20/2012	4/8/2010	4/29/2011
LINE 15B:	TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEEDING THE CURRENT TAX YEAR	\$ -	-	\$ -
LINE 15E:	EXCESS DISTRIBUTION DATE OF SALE COST BASIS	\$ - 1/1/2014 - DEEMED SALE \$ 316	1/1/2014 - DEEMED SALE \$ 563	\$ - 1/1/2014 - DEEMED SALE \$ 631
LINE 15F (NOTE 2):	GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND LOSS FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER	\$ - \$	\$ 4,586	\$ 1,161
	SECTION 1291 FUND		I *	· ·

⁽¹⁾ THESE AMOUNTS ARE INCLUDED IN LINE 6A OF YOUR SCHEDULE K-1. PLEASE CONSULT YOUR TAX ADVISOR.

Form **8621**

(Rev. December 2014) Department of the Treasury Internal Revenue Service

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

▶ Information about Form 8621 and its separate instructions is at www.irs.gov/form8621.

OMB No. 1545-1002

lame of shareholder	Identifying number (see instructions)			
AMERICAN JEWISH COMMITTEE	13-5563393			
lumber, street, and room or suite no. (If a P.O. box, see instructions.)	Shareholder tax year: calendar year 2014 or other tax year			
165 EAST 56TH STREET	beginning and ending .			
City or town, state, and ZIP code or country				
NEW YORK, NY 10022-2709				
Check type of shareholder filing the return: Individual X Corporation Individual X Corporation Individual Indi	Partnership S Corporation Nongrantor Trust Estate Employer identification number (if any)			
	N/A			
ZAIS INVESTMENT GRADE LIMITED VII Address (Enter number, street, city or town, and country.)	Reference ID number (see instructions)			
C/O MAPLES FINANCE LIMITED, PO BOX 1093GT	AJCZIGLVII			
QUEENSGATE HOUSE, SOUTH CHURCH ST GEORGE TOWN	Tax year of PFIC or QEF: calendar year 2014 or other tax year			
GRAND CAYMAN, CAYMAN ISLANDS	beginning and			
	ending .			
Part I Summary of Annual Information (See instructions.)				
Provide the following information with respect to all shares of the PFIC held by the	e shareholder:			
1 Description of each class of shares held by the shareholder: INCOME NO	<u> DTES </u>			
Check if shares jointly owned with spouse.				
2. Data shares acquired during the toyoble year if applicables. N/A				
2 Date shares acquired during the taxable year, if applicable: N/A				
3 Number of shares held at the end of the taxable year: 1039				
1 Number of Strates field at the end of the taxable year.				
4 Value of shares held at the end of the taxable year (check the appropriate bo	ox, if applicable):			
(a) X \$0-50,000 (b) S \$50,001-100,000 (c) S \$100,001-15	50,000 (d) \$150,001-200,000			
(e) If more than \$200,000, list value:				
Type of PFIC and amount of any excess distribution or gain treated as an excunder section 1291, inclusion under section 1293, or inclusion or deduction (a) X Section 1291 \$				
Part II Elections (See instructions.)				
A Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to tree	eat the PEIC as a OFE. Complete lines 6a through 7c of Part III			
B Election To Extend Time For Payment of Tax. I, a shareholder of a QEF earnings and profits of the QEF until this election is terminated. Complete	, elect to extend the time for payment of tax on the undistributed			
Note: If any portion of line 6a or line 7a of Part III is includible under section and 1294(f) and the related regulations for events that terminate this elections.				
C Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, election meaning of section 1296(e). Complete Part IV.	t to mark-to-market the PFIC stock that is marketable within the			
Deemed Sale Election. I, a shareholder on the first day of a PFIC's first t interest in the PFIC. Enter gain or loss on line 15f of Part V.	ax year as a QEF, elect to recognize gain on the deemed sale of my			
Deemed Dividend Election. I, a shareholder on the first day of a PFIC's fi elect to treat an amount equal to my share of the post-1986 earnings an line 15e of Part V. If the excess distribution is greater than zero, also comp	d profits of the CFC as an excess distribution. Enter this amount on			
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder o treat as an excess distribution the gain recognized on the deemed sale of under section 1297(a). Enter gain on line 15f of Part V.	f a former PFIC or a PFIC to which section 1297(d) applies, elect to			
Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a Regulations section 1.1297-3(a), elect to make a deemed dividend elect stock of the Section 1297(e) PFIC includes the CFC qualification date, a distribution on line 15e, Part V. If the excess distribution is greater than ze	tion with respect to the Section 1297(e) PFIC. My holding period in the s defined in Regulations section 1.1297-3(d). Enter the excess			
H Deemed Dividend Election With Respect to a Former PFIC. I, a sharehor 1.1298-3(a), elect to make a deemed dividend election with respect to the includes the termination date, as defined in Regulations section 1.1298-3 distribution is greater than zero, also complete line 16, Part V.	older of a former PFIC, within the meaning of Regulations section he former PFIC. My holding period in the stock of the former PFIC			

Form 8621 (Rev. 12-2014)

Part	Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a th	hrough 7c. If you are making	
	Election B, also complete lines 8a through 9c. (See instructions.)		
6a	Enter your pro rata share of the ordinary earnings of the QEF 6a		
b	Enter the portion of line 6a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income	6c	
7a	Enter your pro rata share of the total net capital gain of the QEF	_	
b	Enter the portion of line 7a that is included in income under section 951 or that		
	may be excluded under section 1293(g)		
С	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amount in Part II of the		
	Schedule D used for your income tax return. (See instructions.)	7c	
8a	Add lines 6c and 7c	8a	
b	Enter the total amount of cash and the fair market value of other property distributed		
	or deemed distributed to you during the tax year of the QEF. (See instructions.) 8b	_	
С	Enter the portion of line 8a not already included in line 8b that is attributable to		
	shares in the QEF that you disposed of, pledged, or otherwise transferred during the		
	tax year	_	
d	Add lines 8b and 8c	8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets)	8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible in income under section		
	951, you may make Election B with respect to the amount on line 8e.		
9a	Enter the total tax for the tax year (See instructions.)	-	
b	Enter the total tax for the tax year determined without regard to the amount		
	entered on line 8e	-	
С	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by	0-	
Part	making Election B. See instructions	9c	_
10 a	Enter the fair market value of your PFIC stock at the end of the tax year	10a	
b	Enter your adjusted basis in the stock at the end of the tax year	10b	_
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary	100	_
·	income on your tax return. If a loss, go to line 11	10c	
11	Enter any unreversed inclusions (as defined in section 1296(d))	11	_
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as		_
	an ordinary loss on your tax return	12	
13	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:	12	_
а	Enter the fair market value of the stock on the date of sale or disposition	13a	
b	Enter the adjusted basis of the stock on the date of sale or disposition	13b	_
С	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on		_
	your tax return. If a loss, go to line 14	13c	
14 a	Enter any unreversed inclusions (as defined in section 1296(d))	14a	_
b	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as		
	an ordinary loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete		
	line 14c	14b	
С	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount		
	on your tax return according to the rules generally applicable for losses provided elsewhere in the Code and		
	regulations	14c	
	Note. See instructions in case of multiple sales or dispositions.		

Form 8621 (Rev. 12-2014) Page 3 Distributions From and Dispositions of Stock of a Section 1291 Fund (See instructions.) Part V Complete a **separate** Part V for each excess distribution and disposition (see instructions). 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the 0.00 15a applicable stock. If the holding period of the stock began in the current tax year, see instructions Enter the total distributions (reduced by the portions of such distributions that were excess distributions but b not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period 0.00 before the current tax year) 15b 15c Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) 15d d Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution 15e Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, 0.00 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income. 16b Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). (See instructions.) 16d 16e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. (See instructions.) Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Part VI Complete a separate column for each outstanding election. Complete lines 25 and 26 only if there is a partial termination of the section 1294 election. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election 18 Undistributed earnings to which the election relates . . 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date 21 Event terminating election. . 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return 24 Accrued interest due with this return

25 Deferred tax outstanding after partial termination of election
 26 Interest accrued after partial termination of election

(Rev. December 2013)

Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

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

OMB No. 1545-0026

Part I U.S. Transferor Information (se	ee instructions)				
Name of transferor			Identifying numb	`	ıctions)
AMERICAN JEWISH COMMITTEE			13-556339	3	
1 If the transferor was a corporation, comp a If the transfer was a section 361(a) or (b or fewer domestic corporations?) transfer, was the trans	sferor controlled (under section		Yes	No N
b Did the transferor remain in existence af				X Yes	No
If not, list the controlling shareholder(s) a	and their identifying num	ber(s):			
Controlling shareholde	r	lden	tifying number		
c If the transferor was a member of an aff corporation? If not, list the name and employer identify.			_	Yes	No N
Name of parent corporate	tion	EIN of p	parent corporation	on	
d Have basis adjustments under section 36	67(a)(5) been made?			Yes	No N
 If the transferor was a partner in a partner of a partner		actual transferor (but is not	treated as such	n under sed	ction 367),
Name of partnership		EIN	of partnership		
b Did the partner pick up its pro rata share	of gain on the transfer of	of nartnership assets?		Yes	No
c Is the partner disposing of its entire inter d Is the partner disposing of an interest in	est in the partnership?			Yes	No
securities market?				Yes	No
Part Transferee Foreign Corporation	n Information (see ins	structions)			
3 Name of transferee (foreign corporation) SENATOR GLOBAL OPPORTUNITY OFFSHORE FUND II LTD. N/A			any 		
5 Address (including country) C/O CITCO (CANADA) INC,		4b Reference ID number (see instructions)			
2 BLOOR STREET EAST, STE. 2700, TORONTO			AJCSGII		
 6 Country code of country of incorporation CA 		structions)			
7 Foreign law characterization (see instruc	tions)				
CORPORATION				I.	
8 Is the transferee foreign corporation a co		tion? NOT DISCLOSED	Yes		
For Paperwork Reduction Act Notice, see separate	e instructions.			Form 926 (F	Rev. 12-2013)

Page 2 Form 926 (Rev. 12-2013)

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
ash	3/31/2014		500,000		
ock and curities					
Junios					
stallment					
ligations, count					
eivables or					
nilar property					
eign currency					
other property					
nominated in					
eign currency					
entory					
,					
sets subject to					
oreciation apture (see					
np. Regs. sec.					
67(a)-4T(b))					
ngible property ed in trade or					
siness not listed					
der another tegory					
legory					
angible					
pperty					
an arty to be lessed					
operty to be leased described in final					
temp. Regs. sec.					
67(a)-4(c))					
perty to be					
d (as scribed in					
np. Regs. sec.					
67(a)-4T(d))					
nsfers of oil and					
working interests described in					
np. Regs. sec.					
67(a)-4T(e))					
er property					
upplemental l	Information Required	To Be Reported (see	e instructions):		

Form 926 (Rev. 12-2013) Page **3**

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

9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:		
(a	a) Before 0.031 % (b) After %		
10	Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351; CASH WAS THE ONLY PROPERTY	TRANSFE	RRED
b b	Recapture under section 1503(d)	Yes Yes Yes Yes	X No X No X No No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	Yes	X No
b c d	Indicate whether the transferor was required to recognize income under final and temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following: Tainted property Depreciation recapture Branch loss recapture Any other income recognition provision contained in the above-referenced regulations Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?	Yes Yes Yes Yes Yes Yes	X No X No X No X No
b	If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ►\$		
16	Was cash the only property transferred?	X Yes	No
17a	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?	Yes	X No
b	If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:		

(Rev. December 2013)

Department of the Treasury Internal Revenue Service

U.S. Transferor Information (see instructions)

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

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

OMB No. 1545-0026

Name of transferor	Identifying number (see instructions)		
AMERICAN JEWISH COMMITTEE	13-5563393		
1 If the transferor was a corporation, complete questions 1a the	_		
a If the transfer was a section 361(a) or (b) transfer, was the tr			
or fewer domestic corporations?			
b Did the transferor remain in existence after the transfer?		Yes No	
If not, list the controlling shareholder(s) and their identifying n	number(s):		
Controlling shareholder	Iden	tifying number	
c If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN)			
Name of parent corporation		parent corporation	
d Have basis adjustments under section 367(a)(5) been made?		Yes No	
2 If the transferor was a partner in a partnership that was the complete questions 2a through 2d.a List the name and EIN of the transferor's partnership:	he actual transferor (but is not	t treated as such under section 367)	
Name of partnership	EIN	of partnership	
CENTERBRIDGE CREDIT PARTNERS TE, LP			
b Did the partner pick up its pro rata share of gain on the transf			
 c Is the partner disposing of its entire interest in the partnership d Is the partner disposing of an interest in a limited partnership 			
	3 ,		
Part II Transferee Foreign Corporation Information (see	instructions)	Yes X No	
	instructions)	4a Identifying number, if any	
		98-1205405	
PARK LUXCO 2 S.A.R.L. 5 Address (including country)		4b Reference ID number (see instructions)	
0.5.		(COO MONIGOTION)	
25C, BOULEVARD ROYAL, L-2449, LUXEMBOURG	instructions)		
6 Country code of country of incorporation or organization (see	e instructions)		
7 Foreign law characterization (see instructions)			
r orong r tatt ortal actor action (coo montactions)			
CORPORATION 8 Is the transferee foreign corporation a controlled foreign corp	ogration?	X Yes No	

Form 926 (Rev. 12-2013) Page **2**

Part III Information Regarding Transfer of Property (see instructions)

ash tock and ecurities		property			transfer
ecurities					
stallment					
oligations, count					
ceivables or					
nilar property					
roign ourrongs					
reign currency other property					
nominated in					
eign currency					
ventory					
ventory					
ssets subject to					
epreciation capture (see					
emp. Regs. sec.					
367(a)-4T(b))					
angible property sed in trade or					
usiness not listed					
nder another					
ategory					
Ann aith In					
tangible roperty					
operty to be leased s described in final					
d temp. Regs. sec.					
367(a)-4(c))					
operty to be					
ld (as					
escribed in emp. Regs. sec.					
367(a)-4T(d))					
ansfers of oil and					
s working interests					
s described in emp. Regs. sec.					
367(a)-4T(e))					·
	12/12/2014	PROPERTY	11,648	13,510	
her property					
upplemental I	ntormation Requir	ed To Be Reported (se	ee instructions):		

Form 926 (Rev. 12-2013) Page **3**

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

9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:	
(a	a) Before 0.0000 % (b) After 0.0052 %	
10	Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351	
С	Indicate whether any transfer reported in Part III is subject to any of the following: Gain recognition under section 904(f)(3)	s X No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	s X No
b c	Indicate whether the transferor was required to recognize income under final and temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following: Tainted property	s X No
14	Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?	s X No
	Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?	s X No
	transferred > \$	
16	Was cash the only property transferred?	s X No
17a	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?	s X No
b	If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:	

Form **926** (Rev. 12-2013)