



# 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

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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.

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

For calendar year 2014 or other tax year beginning 01/01, 2014, and ending 12/31, 2014.

**2014**

Department of the Treasury  
Internal Revenue Service

▶ **Information about Form 990-T and its instructions is available at [www.irs.gov/form990t](http://www.irs.gov/form990t).**  
▶ **Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3).**

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

<input type="checkbox"/> Check box if address changed	Name of organization ( <input type="checkbox"/> Check box if name changed and see instructions.)	<b>D Employer identification number</b> (Employees' trust, see instructions.)
<b>B Exempt under section</b> <input checked="" type="checkbox"/> 501(c)(3) <input type="checkbox"/> 408(e) <input type="checkbox"/> 220(e) <input type="checkbox"/> 408A <input type="checkbox"/> 530(a) <input type="checkbox"/> 529(a)	AMERICAN JEWISH COMMITTEE Number, street, and room or suite no. If a P.O. box, see instructions. 165 EAST 56TH STREET City or town, state or province, country, and ZIP or foreign postal code NEW YORK, NY 10022-2709	13-5563393
<b>C Book value of all assets at end of year</b> 164,079,450.	<b>F Group exemption number</b> (See instructions.) ▶	<b>E Unrelated business activity codes</b> (See instructions.) 525990
<b>G Check organization type</b> ▶ <input checked="" type="checkbox"/> 501(c) corporation <input type="checkbox"/> 501(c) trust <input type="checkbox"/> 401(a) trust <input type="checkbox"/> Other trust		

**H Describe the organization's primary unrelated business activity.** ▶ INVESTMENT IN LIMITED PARTNERSHIPS

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

**J** The books are in care of ▶ DANIEL GOLDWATER CONTROLLER Telephone number ▶ 212-891-1473

Part I Unrelated Trade or Business Income		(A) Income	(B) Expenses	(C) Net
1a	Gross receipts or sales			
b	Less returns and allowances			
c Balance ▶		1c		
2	Cost of goods sold (Schedule A, line 7)			
3	Gross profit. Subtract line 2 from line 1c			
4a	Capital gain net income (attach Schedule D)	10,832.		10,832.
b	Net gain (loss) (Form 4797, Part II, line 17) (attach Form 4797)			
c	Capital loss deduction for trusts			
5	Income (loss) from partnerships and S corporations (attach statement)	36,646.	ATCH 1	36,646.
6	Rent income (Schedule C)			
7	Unrelated debt-financed income (Schedule E)			
8	Interest, annuities, royalties, and rents from controlled organizations (Schedule F)			
9	Investment income of a section 501(c)(7), (9), or (17) organization (Schedule G)			
10	Exploited exempt activity income (Schedule I)			
11	Advertising income (Schedule J)			
12	Other income (See instructions; attach schedule)			
13	<b>Total.</b> Combine lines 3 through 12	47,478.		47,478.

Part II Deductions Not Taken Elsewhere (See instructions for limitations on deductions.) (Except for contributions, deductions must be directly connected with the unrelated business income.)			
14	Compensation of officers, directors, and trustees (Schedule K)		14
15	Salaries and wages		15
16	Repairs and maintenance		16
17	Bad debts		17
18	Interest (attach schedule)		18
19	Taxes and licenses	ATTACHMENT 3	19 1,831.
20	Charitable contributions (See instructions for limitation rules)		20
21	Depreciation (attach Form 4562)	21	
22	Less depreciation claimed on Schedule A and elsewhere on return	22a	22b
23	Depletion		23
24	Contributions to deferred compensation plans		24
25	Employee benefit programs		25
26	Excess exempt expenses (Schedule I)		26
27	Excess readership costs (Schedule J)		27
28	Other deductions (attach schedule)	ATTACHMENT 2	28 4,800.
29	<b>Total deductions.</b> Add lines 14 through 28		29 6,631.
30	Unrelated business taxable income before net operating loss deduction. Subtract line 29 from line 13		30 40,847.
31	Net operating loss deduction (limited to the amount on line 30)	ATTACHMENT 4	31 40,847.
32	Unrelated business taxable income before specific deduction. Subtract line 31 from line 30		32
33	Specific deduction (Generally \$1,000, but see line 33 instructions for exceptions)		33 1,000.
34	<b>Unrelated business taxable income.</b> Subtract line 33 from line 32. If line 33 is greater than line 32, enter the smaller of zero or line 32		34 0

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

► **File a separate application for each return.**  
► Information about Form 8868 and its instructions is at [www.irs.gov/form8868](http://www.irs.gov/form8868).

- If you are filing for an **Automatic 3-Month Extension**, complete only **Part I** and check this box
- If you are filing for an **Additional (Not Automatic) 3-Month Extension**, complete only **Part II** (on page 2 of this form).

**Do not complete Part II unless** you have already been granted an automatic 3-month extension on a previously filed Form 8868.

**Electronic filing (e-file).** You can electronically file Form 8868 if you need a 3-month automatic extension of time to file (6 months for a corporation required to file Form 990-T), or an additional (not automatic) 3-month extension of time. You can electronically file Form 8868 to request an extension of time to file any of the forms listed in Part I or Part II with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, which must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit [www.irs.gov/efile](http://www.irs.gov/efile) and click on *e-file for Charities & Nonprofits*.

**Part I Automatic 3-Month Extension of Time.** Only submit original (no copies needed).

A corporation required to file Form 990-T and requesting an automatic 6-month extension - check this box and complete Part I only

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

Enter filer's identifying number, see instructions

<b>Type or print</b>  File by the due date for filing your return. See instructions.	Name of exempt organization or other filer, see instructions.  AMERICAN JEWISH COMMITTEE	Employer identification number (EIN) or  13-5563393
	Number, street, and room or suite no. If a P.O. box, see instructions.  165 EAST 56TH STREET	Social security number (SSN)
	City, town or post office, state, and ZIP code. For a foreign address, see instructions.  NEW YORK, NY 10022-2709	

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

Application Is For	Return Code	Application Is For	Return Code
Form 990 or Form 990-EZ	01	Form 990-T (corporation)	07
Form 990-BL	02	Form 1041-A	08
Form 4720 (individual)	03	Form 4720 (other than individual)	09
Form 990-PF	04	Form 5227	10
Form 990-T (sec. 401(a) or 408(a) trust)	05	Form 6069	11
Form 990-T (trust other than above)	06	Form 8870	12

- The books are in the care of ► DANIEL GOLDWATER CONTROLLER,, 165 EAST 56TH STREET, NEW YORK, NY 10022

Telephone No. ► 212 891-1473 FAX No. ► 212 750-0326

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

1 I request an automatic 3-month (6 months for a corporation required to file Form 990-T) extension of time until 11/16, 2015, to file the exempt organization return for the organization named above. The extension is for the organization's return for:

►  calendar year 2014 or

►  tax year beginning \_\_\_\_\_, 20\_\_\_\_, and ending \_\_\_\_\_, 20\_\_\_\_.

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

<b>3a</b> If this application is for Form 990-BL, 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions.	<b>3a</b> \$	0
<b>b</b> If this application is for Form 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit.	<b>3b</b> \$	0
<b>c Balance due.</b> Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions.	<b>3c</b> \$	0

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

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

Part III Tax Computation

Table with 3 columns: Description, Amount, and Line Number. Rows include Organizations Taxable as Corporations (35), Trusts Taxable at Trust Rates (36), Proxy tax (37), Alternative minimum tax (38), and Total (39).

Part IV Tax and Payments

Table with 3 columns: Description, Amount, and Line Number. Rows include Foreign tax credit (40a-40e), Other taxes (42), Total tax (43), Payments (44a-44g), Total payments (45), Estimated tax penalty (46), Tax due (47), Overpayment (48), and Refunded (49).

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

Table with 3 columns: Question, Yes, and No. Questions 1-3 regarding foreign interest, foreign trusts, and tax-exempt interest.

Schedule A - Cost of Goods Sold. Enter method of inventory valuation

Table with 3 columns: Description, Amount, and Yes/No. Rows include Inventory at beginning/end of year (1, 6), Purchases (2), Cost of labor (3), Additional section 263A costs (4a, 4b), Total (5), Cost of goods sold (7), and Section 263A rules (8).

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

Signature and Preparer Information section. Includes fields for Signature of officer, CFO, Print/Type preparer's name, Preparer's signature, Date, Firm's name, Firm's address, and Firm's EIN.

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

(see instructions)

1. Description of property

Table with 1 column for description of property, rows (1) through (4).

2. Rent received or accrued

Table with 3 columns: (a) From personal property, (b) From real and personal property, and 3(a) Deductions directly connected with the income. Rows (1) through (4) and a Total row.

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

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

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

Table with 5 columns: 1. Description of debt-financed property, 2. Gross income from or allocable to debt-financed property, 3. Deductions directly connected with or allocable to debt-financed property (a) Straight line depreciation, (b) Other deductions, 4. Amount of average acquisition debt, 5. Average adjusted basis, 6. Column 4 divided by column 5, 7. Gross income reportable, 8. Allocable deductions. Rows (1) through (4).

Totals Total dividends-received deductions included in column 8. Enter here and on page 1, Part I, line 7, column (A). Enter here and on page 1, Part I, line 7, column (B).

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

Table with 6 columns: 1. Name of controlled organization, 2. Employer identification number, 3. Net unrelated income (loss), 4. Total of specified payments made, 5. Part of column 4 that is included in the controlling organization's gross income, 6. Deductions directly connected with income in column 5. Rows (1) through (4).

Nonexempt Controlled Organizations

Table with 5 columns: 7. Taxable Income, 8. Net unrelated income (loss), 9. Total of specified payments made, 10. Part of column 9 that is included in the controlling organization's gross income, 11. Deductions directly connected with income in column 10. Rows (1) through (4).

Add columns 5 and 10. Enter here and on page 1, Part I, line 8, column (A). Add columns 6 and 11. Enter here and on page 1, Part I, line 8, column (B).

Totals

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

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

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

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

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

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

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

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

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

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

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

**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](http://www.irs.gov/form1120).

OMB No. 1545-0123

**2014**

Name

AMERICAN JEWISH COMMITTEE

Employer identification number

13-5563393

**Part I 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 to gain or loss from Form(s) 8949, Part I, line 2, column (g)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
<b>1a</b> Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 1b . . . . .				
<b>1b</b> Totals for all transactions reported on Form(s) 8949 with <b>Box A</b> checked . . . . .				
<b>2</b> Totals for all transactions reported on Form(s) 8949 with <b>Box B</b> checked . . . . .				
<b>3</b> Totals for all transactions reported on Form(s) 8949 with <b>Box C</b> checked . . . . .	2,340.			2,340.
<b>4</b> Short-term capital gain from installment sales from Form 6252, line 26 or 37 . . . . .				<b>4</b>
<b>5</b> Short-term capital gain or (loss) from like-kind exchanges from Form 8824 . . . . .				<b>5</b>
<b>6</b> Unused capital loss carryover (attach computation) . . . . .				<b>6</b> ( )
<b>7</b> Net short-term capital gain or (loss). Combine lines 1a through 6 in column h . . . . .				<b>7</b> 2,340.

**Part II Long-Term Capital Gains and Losses - Assets Held More Than One Year**

See instructions for how to figure the amounts to enter on the lines below. This form may be easier to complete if you round off cents to whole dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part II, line 2, column (g)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
<b>8a</b> Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b . . . . .				
<b>8b</b> Totals for all transactions reported on Form(s) 8949 with <b>Box D</b> checked . . . . .				
<b>9</b> Totals for all transactions reported on Form(s) 8949 with <b>Box E</b> checked . . . . .				
<b>10</b> Totals for all transactions reported on Form(s) 8949 with <b>Box F</b> checked . . . . .	8,492.			8,492.
<b>11</b> Enter gain from Form 4797, line 7 or 9 . . . . .				<b>11</b>
<b>12</b> Long-term capital gain from installment sales from Form 6252, line 26 or 37 . . . . .				<b>12</b>
<b>13</b> Long-term capital gain or (loss) from like-kind exchanges from Form 8824 . . . . .				<b>13</b>
<b>14</b> Capital gain distributions (see instructions) . . . . .				<b>14</b>
<b>15</b> Net long-term capital gain or (loss). Combine lines 8a through 14 in column h . . . . .				<b>15</b> 8,492.

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

<b>16</b> Enter excess of net short-term capital gain (line 7) over net long-term capital loss (line 15) . . . . .				<b>16</b> 2,340.
<b>17</b> Net capital gain. Enter excess of net long-term capital gain (line 15) over net short-term capital loss (line 7) . . . . .				<b>17</b> 8,492.
<b>18</b> Add lines 16 and 17. Enter here and on Form 1120, page 1, line 8, or the proper line on other returns . . . . .				<b>18</b> 10,832.

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

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](http://www.irs.gov/form8949).

**2014**

Department of the Treasury  
Internal Revenue Service

▶ 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**

Name(s) shown on return <b>AMERICAN JEWISH COMMITTEE</b>	Social security number or taxpayer identification number <b>13-5563393</b>
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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 you bought in 2014 or later).

**Part I 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

1	(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 <b>Note</b> below and see <i>Column (e)</i> in the separate instructions	Adjustment, if any, to gain or loss. If you enter an amount in column (g), enter a code in column (f). <b>See the separate instructions.</b>		(h) <b>Gain or (loss).</b> Subtract column (e) from column (d) and combine the result with column (g)
						(f) Code(s) from instructions	(g) Amount of adjustment	
	STCG FROM ANCHORAGE CAPITAL PARTN	VARIOUS	VARIOUS	2,340.				2,340.
<b>2 Totals.</b> Add the amounts in columns (d), (e), (g), and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, <b>line 1b</b> (if <b>Box A</b> above is checked), <b>line 2</b> (if <b>Box B</b> above is checked), or <b>line 3</b> (if <b>Box C</b> above is checked)▶				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.



ATTACHMENT 1

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

ANCHORAGE CAPITAL PARTNERS LP	89.
COPPER TERRACE, LTD.	36,557.
INCOME (LOSS) FROM PARTNERSHIPS	<u>36,646.</u>

ATTACHMENT 2

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

TAX PREPARATION FEE	4,800.
PART II - LINE 28 - OTHER DEDUCTIONS	<u>4,800.</u>

AMERICAN JEWISH COMMITTEE  
December 31, 2014

13-5563393

**STATE TAXES**

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COLORADO	\$ 1,581
NEW YORK	\$ 250
TOTAL STATE TAXES	<u>\$ 1,831</u>

AMERICAN JEWISH COMMITTEE  
December 31, 2014

13-5563393

**Net Operating Loss Carryforward**

	<u>FEDERAL</u>
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)
<b>NET OPERATING LOSS CARRYFORWARD TO 12/31/2015</b>	<b><u><u>\$ 3,456,243</u></u></b>

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

**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](http://www.irs.gov/form8621).

Name of shareholder <b>AMERICAN JEWISH COMMITTEE</b>		Identifying number (see instructions) <b>13-5563393</b>	
Number, street, and room or suite no. (If a P.O. box, see instructions.) <b>165 EAST 56TH STREET</b>		Shareholder tax year: calendar year <b>2014</b> or other tax year beginning _____ and ending _____	
City or town, state, and ZIP code or country <b>NEW YORK, NY 10022-2709</b>			
Check type of shareholder filing the return: <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate		Employer identification number (if any) <b>N/A</b>	
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) <b>ALPSTAR CLO 2 P.L.C</b>		Reference ID number (see instructions) <b>AJCAC2PLC</b>	
Address (Enter number, street, city or town, and country.) <b>5 HARBOURMASTER PLACE, INTERNATIONAL FINANCIAL SERVICES CENTER, DUBLIN 1, IRELAND</b>		Tax year of PFIC or QEF: calendar year <b>2014</b> 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 shareholder:

- 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 box, if applicable):  
 (a)  \$0-50,000 (b)  \$50,001-100,000 (c)  \$100,001-150,000 (d)  \$150,001-200,000  
 (e) If more than \$200,000, list value: \_\_\_\_\_
- 5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296:  
 (a)  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 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 QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*  
**Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C**  **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D**  **Deemed Sale Election.** I, a shareholder on the first day of a PFIC's first tax 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 first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. *Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V.*
- F**  **Election To Recognize Gain on Deemed Sale of PFIC.** I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale 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.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*
- H**  **Deemed Dividend Election With Respect to a Former PFIC.** I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*



**Part III Income From a Qualified Electing Fund (QEF).** All QEF shareholders complete lines 6a through 7c. If you are making Election B, also complete lines 8a through 9c. (See instructions.)

<b>6a</b>	Enter your pro rata share of the ordinary earnings of the QEF . . . . .	<b>6a</b>		
<b>b</b>	Enter the portion of line 6a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>6b</b>		
<b>c</b>	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income . . . . .		<b>6c</b>	
<b>7a</b>	Enter your pro rata share of the total net capital gain of the QEF . . . . .	<b>7a</b>		
<b>b</b>	Enter the portion of line 7a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>7b</b>		
<b>c</b>	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.) . . . . .		<b>7c</b>	
<b>8a</b>	Add lines 6c and 7c. . . . .		<b>8a</b>	
<b>b</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.) . . . . .	<b>8b</b>		
<b>c</b>	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. . . . .	<b>8c</b>		
<b>d</b>	Add lines 8b and 8c. . . . .		<b>8d</b>	
<b>e</b>	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) . . . . .		<b>8e</b>	
	<b>Important:</b> 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.			
<b>9a</b>	Enter the total tax for the tax year (See instructions.) . . . . .	<b>9a</b>		
<b>b</b>	Enter the total tax for the tax year determined without regard to the amount entered on line 8e. . . . .	<b>9b</b>		
<b>c</b>	Subtract line 9b from line 9a. <b>This is the deferred tax, the time for payment of which is extended by making Election B. See instructions.</b> . . . . .		<b>9c</b>	

**Part IV Gain or (Loss) From Mark-to-Market Election (See instructions.)**

<b>10a</b>	Enter the fair market value of your PFIC stock at the end of the tax year . . . . .	<b>10a</b>	
<b>b</b>	Enter your adjusted basis in the stock at the end of the tax year . . . . .	<b>10b</b>	
<b>c</b>	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income on your tax return. If a loss, go to line 11 . . . . .		<b>10c</b>
<b>11</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>11</b>
<b>12</b>	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 . . . . .		<b>12</b>
<b>13</b>	<b>If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:</b>		
<b>a</b>	Enter the fair market value of the stock on the date of sale or disposition . . . . .	<b>13a</b>	
<b>b</b>	Enter the adjusted basis of the stock on the date of sale or disposition . . . . .	<b>13b</b>	
<b>c</b>	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 . . . . .		<b>13c</b>
<b>14a</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>14a</b>
<b>b</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. . . . .		<b>14b</b>
<b>c</b>	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 . . . . .		<b>14c</b>

**Note.** See instructions in case of multiple sales or dispositions.

**Part V Distributions From and Dispositions of Stock of a Section 1291 Fund** (See instructions.) SEE STATEMENT 1  
 Complete a **separate Part V** for each excess distribution and disposition (see instructions).

<b>15a</b>	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 . . . . .	<b>15a</b>	
<b>b</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) . . . . .	<b>15b</b>	
<b>c</b>	Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) . . . . .	<b>15c</b>	
<b>d</b>	Multiply line 15c by 125% (1.25). . . . .	<b>15d</b>	
<b>e</b>	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, <b>do not</b> 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 . . . . .	<b>15e</b>	
<b>f</b>	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 <b>do not</b> complete line 16 . . . . .	<b>15f</b>	
<b>16a</b>	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>b</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. . . . .	<b>16b</b>	
<b>c</b>	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.) . . . . .	<b>16c</b>	
<b>d</b>	Foreign tax credit. (See instructions.) . . . . .	<b>16d</b>	
<b>e</b>	Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) . . . . .	<b>16e</b>	
<b>f</b>	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.) . . . . .	<b>16f</b>	

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

**PARTNERSHIP NAME:** ANCHORAGE CAPITAL PARTNERS, LP  
**PARTNERSHIP EIN:** 20-0059325  
**INVESTOR NAME:** AMERICAN JEWISH COMMITTEE  
**INVESTOR EIN:** 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:	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	5 HARBOURMASTER PLACE INTERNATIONAL FINANCIAL SERVICES CENTER DUBLIN 1, IRELAND
PFIC EIN:	N/A	N/A	N/A	N/A
PFIC TAX YEAR:	JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014
<b>PART I SUMMARY OF ANNUAL INFORMATION</b>				
LINE 1: DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER	SUBORDINATED NOTES	SUBORDINATED NOTES	SUBORDINATED NOTES	SUBORDINATED NOTES
LINE 2: DATE SHARES ACQUIRED DURING THE TAXABLE YEAR, IF APPLICABLE	N/A	N/A	N/A	N/A
LINE 3: NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR	107	732	377	1,297
LINE 4: VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR	\$ 86	\$ 414	\$ 213	\$ 734
LINE 5: TYPE OF PFIC	SECTION 1291	SECTION 1291	SECTION 1291	SECTION 1291
LINE 5A/B/C: INCOME INCLUSION	\$ 20	\$ 244	\$ 125	\$ 432
<b>PART V DISTRIBUTIONS FROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND</b>				
LINE 15A (NOTE 1): DATE OF ACQUISITION	3/10/2011	12/16/2010	12/16/2010	11/23/2010
LINE 15B: TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR	\$ -	\$ -	\$ -	\$ -
LINE 15C: TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEDING THE CURRENT TAX YEAR	\$ -	\$ -	\$ -	\$ -
LINE 15D: EXCESS DISTRIBUTION	\$ -	\$ -	\$ -	\$ -
LINE 15E: DATE OF SALE	1/1/2014 - DEEMED SALE	1/1/2014 - DEEMED SALE	1/1/2014 - DEEMED SALE	1/1/2014 - DEEMED SALE
LINE 15F (NOTE 2): COST BASIS	\$ 62	\$ 156	\$ 80	\$ 277
LINE 15G (NOTE 2): GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND	\$ 20	\$ 244	\$ 125	\$ 432
LINE 15H (NOTE 2): 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.

(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.

**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](http://www.irs.gov/form8621).

Name of shareholder <b>AMERICAN JEWISH COMMITTEE</b>		Identifying number (see instructions) <b>13-5563393</b>	
Number, street, and room or suite no. (If a P.O. box, see instructions.) <b>165 EAST 56TH STREET</b>		Shareholder tax year: calendar year <b>2014</b> or other tax year beginning _____ and ending _____	
City or town, state, and ZIP code or country <b>NEW YORK, NY 10022-2709</b>			
Check type of shareholder filing the return:	<input type="checkbox"/> Individual	<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Partnership
			<input type="checkbox"/> S Corporation
			<input type="checkbox"/> Nongrantor Trust
			<input type="checkbox"/> Estate
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) <b>CAIRN CLO II B.V.</b>		Employer identification number (if any) <b>N/A</b>	
Address (Enter number, street, city or town, and country.) <b>PARNASSUSTOREN, LOCATELLIKADE 1 1076 AZ, AMSTERDAM, THE NETHERLANDS</b>		Reference ID number (see instructions) <b>AJCCCIIBV</b>	
		Tax year of PFIC or QEF: calendar year <b>2014</b> 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 shareholder:

- 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 box, if applicable):  
 (a)  \$0-50,000 (b)  \$50,001-100,000 (c)  \$100,001-150,000 (d)  \$150,001-200,000  
 (e) If more than \$200,000, list value: \_\_\_\_\_
- 5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296:  
 (a)  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 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 QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.  
**Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C**  **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
- D**  **Deemed Sale Election.** I, a shareholder on the first day of a PFIC's first tax 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 first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V.
- F**  **Election To Recognize Gain on Deemed Sale of PFIC.** I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale 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.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.
- H**  **Deemed Dividend Election With Respect to a Former PFIC.** I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.

**Part III Income From a Qualified Electing Fund (QEF).** All QEF shareholders complete lines 6a through 7c. If you are making Election B, also complete lines 8a through 9c. (See instructions.)

<b>6a</b>	Enter your pro rata share of the ordinary earnings of the QEF . . . . .	<b>6a</b>		
<b>b</b>	Enter the portion of line 6a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>6b</b>		
<b>c</b>	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income . . . . .		<b>6c</b>	
<b>7a</b>	Enter your pro rata share of the total net capital gain of the QEF . . . . .	<b>7a</b>		
<b>b</b>	Enter the portion of line 7a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>7b</b>		
<b>c</b>	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.) . . . . .		<b>7c</b>	
<b>8a</b>	Add lines 6c and 7c. . . . .		<b>8a</b>	
<b>b</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.) . . . . .	<b>8b</b>		
<b>c</b>	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. . . . .	<b>8c</b>		
<b>d</b>	Add lines 8b and 8c. . . . .		<b>8d</b>	
<b>e</b>	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) . . . . .		<b>8e</b>	
	<b>Important:</b> 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.			
<b>9a</b>	Enter the total tax for the tax year (See instructions.) . . . . .	<b>9a</b>		
<b>b</b>	Enter the total tax for the tax year determined without regard to the amount entered on line 8e. . . . .	<b>9b</b>		
<b>c</b>	Subtract line 9b from line 9a. <b>This is the deferred tax, the time for payment of which is extended by making Election B. See instructions.</b> . . . . .		<b>9c</b>	

**Part IV Gain or (Loss) From Mark-to-Market Election (See instructions.)**

<b>10a</b>	Enter the fair market value of your PFIC stock at the end of the tax year . . . . .	<b>10a</b>	
<b>b</b>	Enter your adjusted basis in the stock at the end of the tax year . . . . .	<b>10b</b>	
<b>c</b>	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income on your tax return. If a loss, go to line 11 . . . . .		<b>10c</b>
<b>11</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>11</b>
<b>12</b>	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 . . . . .		<b>12</b>
<b>13</b>	<b>If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:</b>		
<b>a</b>	Enter the fair market value of the stock on the date of sale or disposition . . . . .	<b>13a</b>	
<b>b</b>	Enter the adjusted basis of the stock on the date of sale or disposition . . . . .	<b>13b</b>	
<b>c</b>	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 . . . . .		<b>13c</b>
<b>14a</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>14a</b>
<b>b</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. . . . .		<b>14b</b>
<b>c</b>	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 . . . . .		<b>14c</b>

**Note.** See instructions in case of multiple sales or dispositions.

**Part V Distributions From and Dispositions of Stock of a Section 1291 Fund** (See instructions.) SEE STATEMENT 1  
 Complete a **separate Part V** for each excess distribution and disposition (see instructions).

<b>15a</b>	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 . . . . .	<b>15a</b>	
<b>b</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) . . . . .	<b>15b</b>	
<b>c</b>	Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) . . . . .	<b>15c</b>	
<b>d</b>	Multiply line 15c by 125% (1.25). . . . .	<b>15d</b>	
<b>e</b>	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, <b>do not</b> 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 . . . . .	<b>15e</b>	
<b>f</b>	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 <b>do not</b> complete line 16 . . . . .	<b>15f</b>	
<b>16a</b>	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>b</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. . . . .	<b>16b</b>	
<b>c</b>	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.) . . . . .	<b>16c</b>	
<b>d</b>	Foreign tax credit. (See instructions.) . . . . .	<b>16d</b>	
<b>e</b>	Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) . . . . .	<b>16e</b>	
<b>f</b>	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.) . . . . .	<b>16f</b>	

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

**PARTNERSHIP NAME:** ANCHORAGE CAPITAL PARTNERS, LP  
**PARTNERSHIP EIN:** 20-0059325  
**INVESTOR NAME:** AMERICAN JEWISH COMMITTEE  
**INVESTOR EIN:** 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:		N/A	N/A
PFIC TAX YEAR:		JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014
<b>PART I SUMMARY OF ANNUAL INFORMATION</b>			
LINE 1: DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER		SUBORDINATED NOTES	SUBORDINATED NOTES
LINE 2: DATE SHARES ACQUIRED DURING THE TAXABLE YEAR, IF APPLICABLE		N/A	N/A
LINE 3: NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR		-	-
LINE 4: VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR		\$ SECTION 1291 -	\$ SECTION 1291 -
LINE 5: TYPE OF PFIC		\$ -	\$ 404
LINE 5A/B/C: INCOME INCLUSION			
<b>PART V DISTRIBUTIONS FROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND</b>			
DATE OF ACQUISITION		3/14/2013	9/16/2010
LINE 15A (NOTE 1): TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR		\$ 432	\$ 159
LINE 15B: TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEEDING THE CURRENT TAX YEAR		\$ 718	\$ 325
LINE 15E: EXCESS DISTRIBUTION		\$ -	\$ 23
DATE OF SALE		9/11/2014	9/11/2014
COST BASIS		\$ 1,825	\$ 259
LINE 15F (NOTE 2): GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND		\$ -	\$ 381
LOSS FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND		\$ (82)	\$ -

(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.

**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](http://www.irs.gov/form8621).

Name of shareholder <b>AMERICAN JEWISH COMMITTEE</b>		Identifying number (see instructions) <b>13-5563393</b>	
Number, street, and room or suite no. (If a P.O. box, see instructions.) <b>165 EAST 56TH STREET</b>		Shareholder tax year: calendar year <b>2014</b> or other tax year beginning _____ and ending _____	
City or town, state, and ZIP code or country <b>NEW YORK, NY 10022-2709</b>			
Check type of shareholder filing the return: Individual <input type="checkbox"/> Corporation <input checked="" type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate <input type="checkbox"/>		Employer identification number (if any) <b>N/A</b>	
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) <b>CORDATUS CLO I P.L.C.</b>		Reference ID number (see instructions) <b>AJCCCIPLC</b>	
Address (Enter number, street, city or town, and country.) <b>C/O DEUTSCHE INTERNATIONAL CORPORATE SERVICES (IRELAND) LIMITED, 5 HARBOURMASTER PLACE, DUBLIN 1, IRELAND</b>		Tax year of PFIC or QEF: calendar year _____ or other tax year beginning <b>JULY 1, 2013</b> and ending <b>JUNE 30, 2014</b>	

**Part I Summary of Annual Information (See instructions.)**

Provide the following information with respect to all shares of the PFIC held by the shareholder:

- 1 Description of each class of shares held by the shareholder: **SUBORDINATED 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 box, if applicable):  
 (a)  \$0-50,000 (b)  \$50,001-100,000 (c)  \$100,001-150,000 (d)  \$150,001-200,000  
 (e) If more than \$200,000, list value: \_\_\_\_\_
- 5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296:  
 (a)  Section 1291 \$ **515.00**  
 (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 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 QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*  
**Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C**  **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D**  **Deemed Sale Election.** I, a shareholder on the first day of a PFIC's first tax 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 first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. *Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V.*
- F**  **Election To Recognize Gain on Deemed Sale of PFIC.** I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale 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.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*
- H**  **Deemed Dividend Election With Respect to a Former PFIC.** I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*



**Part III Income From a Qualified Electing Fund (QEF).** All QEF shareholders complete lines 6a through 7c. If you are making Election B, also complete lines 8a through 9c. (See instructions.)

<b>6a</b>	Enter your pro rata share of the ordinary earnings of the QEF . . . . .	<b>6a</b>		
<b>b</b>	Enter the portion of line 6a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>6b</b>		
<b>c</b>	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income . . . . .		<b>6c</b>	
<b>7a</b>	Enter your pro rata share of the total net capital gain of the QEF . . . . .	<b>7a</b>		
<b>b</b>	Enter the portion of line 7a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>7b</b>		
<b>c</b>	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.) . . . . .		<b>7c</b>	
<b>8a</b>	Add lines 6c and 7c. . . . .		<b>8a</b>	
<b>b</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.) . . . . .	<b>8b</b>		
<b>c</b>	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. . . . .	<b>8c</b>		
<b>d</b>	Add lines 8b and 8c. . . . .		<b>8d</b>	
<b>e</b>	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) . . . . .		<b>8e</b>	
	<b>Important:</b> 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.			
<b>9a</b>	Enter the total tax for the tax year (See instructions.) . . . . .	<b>9a</b>		
<b>b</b>	Enter the total tax for the tax year determined without regard to the amount entered on line 8e. . . . .	<b>9b</b>		
<b>c</b>	Subtract line 9b from line 9a. <b>This is the deferred tax, the time for payment of which is extended by making Election B. See instructions.</b> . . . . .		<b>9c</b>	

**Part IV Gain or (Loss) From Mark-to-Market Election (See instructions.)**

<b>10a</b>	Enter the fair market value of your PFIC stock at the end of the tax year . . . . .	<b>10a</b>	
<b>b</b>	Enter your adjusted basis in the stock at the end of the tax year . . . . .	<b>10b</b>	
<b>c</b>	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income on your tax return. If a loss, go to line 11 . . . . .		<b>10c</b>
<b>11</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>11</b>
<b>12</b>	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 . . . . .		<b>12</b>
<b>13</b>	<b>If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:</b>		
<b>a</b>	Enter the fair market value of the stock on the date of sale or disposition . . . . .	<b>13a</b>	
<b>b</b>	Enter the adjusted basis of the stock on the date of sale or disposition . . . . .	<b>13b</b>	
<b>c</b>	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 . . . . .		<b>13c</b>
<b>14a</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>14a</b>
<b>b</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. . . . .		<b>14b</b>
<b>c</b>	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 . . . . .		<b>14c</b>

**Note.** See instructions in case of multiple sales or dispositions.

**Part V Distributions From and Dispositions of Stock of a Section 1291 Fund** (See instructions.)  
 Complete a **separate Part V** for each excess distribution and disposition (see instructions).

<b>15a</b>	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 . . . . .	<b>15a</b>	0.00
<b>b</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) . . . . .	<b>15b</b>	0.00
<b>c</b>	Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) . . . . .	<b>15c</b>	
<b>d</b>	Multiply line 15c by 125% (1.25). . . . .	<b>15d</b>	
<b>e</b>	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, <b>do not</b> 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 . . . . .	<b>15e</b>	0.00
<b>f</b>	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 <b>do not</b> complete line 16 . . . . .	<b>15f</b>	515.00
<b>16a</b>	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>b</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. . . . .	<b>16b</b>	
<b>c</b>	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.) . . . . .	<b>16c</b>	
<b>d</b>	Foreign tax credit. (See instructions.) . . . . .	<b>16d</b>	
<b>e</b>	Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) . . . . .	<b>16e</b>	
<b>f</b>	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.) . . . . .	<b>16f</b>	

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

# 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](http://www.irs.gov/form8621).

Name of shareholder <b>AMERICAN JEWISH COMMITTEE</b>		Identifying number (see instructions) <b>13-5563393</b>	
Number, street, and room or suite no. (If a P.O. box, see instructions.) <b>165 EAST 56TH STREET</b>		Shareholder tax year: calendar year <b>2014</b> or other tax year beginning and ending	
City or town, state, and ZIP code or country <b>NEW YORK, NY 10022-2709</b>			
Check type of shareholder filing the return:	<input type="checkbox"/> Individual <input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Partnership	<input type="checkbox"/> S Corporation
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) <b>DALRADIAN EUROPEAN CLO III B.V.</b>		Employer identification number (if any) <b>N/A</b>	
Address (Enter number, street, city or town, and country.) <b>PARNASSUSTOREN, LOCATELLIKADE 1 1076 AZ, AMSTERDAM, THE NETHERLANDS</b>		Reference ID number (see instructions) <b>AJCDECIIBV</b>	
		Tax year of PFIC or QEF: calendar year <b>2014</b> 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 shareholder:

- Description of each class of shares held by the shareholder: **SUBORDINATED NOTES**  
 Check if shares jointly owned with spouse.
- Date shares acquired during the taxable year, if applicable: **N/A**
- Number of shares held at the end of the taxable year: **0**
- Value of shares held at the end of the taxable year (check the appropriate box, if applicable):  
(a)  \$0-50,000 (b)  \$50,001-100,000 (c)  \$100,001-150,000 (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 excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296:  
(a)  Section 1291 \$ **101.00**  
(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 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 QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*  
**Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C**  **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D**  **Deemed Sale Election.** I, a shareholder on the first day of a PFIC's first tax 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 first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. *Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V.*
- F**  **Election To Recognize Gain on Deemed Sale of PFIC.** I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale 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.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*
- H**  **Deemed Dividend Election With Respect to a Former PFIC.** I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*

**Part III Income From a Qualified Electing Fund (QEF).** All QEF shareholders complete lines 6a through 7c. If you are making Election B, also complete lines 8a through 9c. (See instructions.)

<b>6a</b>	Enter your pro rata share of the ordinary earnings of the QEF . . . . .	<b>6a</b>		
<b>b</b>	Enter the portion of line 6a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>6b</b>		
<b>c</b>	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income . . . . .		<b>6c</b>	
<b>7a</b>	Enter your pro rata share of the total net capital gain of the QEF . . . . .	<b>7a</b>		
<b>b</b>	Enter the portion of line 7a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>7b</b>		
<b>c</b>	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.) . . . . .		<b>7c</b>	
<b>8a</b>	Add lines 6c and 7c. . . . .		<b>8a</b>	
<b>b</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.) . . . . .	<b>8b</b>		
<b>c</b>	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. . . . .	<b>8c</b>		
<b>d</b>	Add lines 8b and 8c. . . . .		<b>8d</b>	
<b>e</b>	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) . . . . .		<b>8e</b>	
	<b>Important:</b> 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.			
<b>9a</b>	Enter the total tax for the tax year (See instructions.) . . . . .	<b>9a</b>		
<b>b</b>	Enter the total tax for the tax year determined without regard to the amount entered on line 8e. . . . .	<b>9b</b>		
<b>c</b>	Subtract line 9b from line 9a. <b>This is the deferred tax, the time for payment of which is extended by making Election B. See instructions.</b> . . . . .		<b>9c</b>	

**Part IV Gain or (Loss) From Mark-to-Market Election (See instructions.)**

<b>10a</b>	Enter the fair market value of your PFIC stock at the end of the tax year . . . . .	<b>10a</b>	
<b>b</b>	Enter your adjusted basis in the stock at the end of the tax year . . . . .	<b>10b</b>	
<b>c</b>	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income on your tax return. If a loss, go to line 11 . . . . .		<b>10c</b>
<b>11</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>11</b>
<b>12</b>	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 . . . . .		<b>12</b>
<b>13</b>	<b>If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:</b>		
<b>a</b>	Enter the fair market value of the stock on the date of sale or disposition . . . . .	<b>13a</b>	
<b>b</b>	Enter the adjusted basis of the stock on the date of sale or disposition . . . . .	<b>13b</b>	
<b>c</b>	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 . . . . .		<b>13c</b>
<b>14a</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>14a</b>
<b>b</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. . . . .		<b>14b</b>
<b>c</b>	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 . . . . .		<b>14c</b>

**Note.** See instructions in case of multiple sales or dispositions.

**Part V Distributions From and Dispositions of Stock of a Section 1291 Fund** (See instructions.)  
 Complete a **separate Part V** for each excess distribution and disposition (see instructions).

<b>15a</b>	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 . . . . .	<b>15a</b>	41.00
<b>b</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) . . . . .	<b>15b</b>	2.00
<b>c</b>	Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) . . . . .	<b>15c</b>	0.67
<b>d</b>	Multiply line 15c by 125% (1.25). . . . .	<b>15d</b>	0.84
<b>e</b>	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, <b>do not</b> 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 . . . . .	<b>15e</b>	40.16
<b>f</b>	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 <b>do not</b> complete line 16 . . . . .	<b>15f</b>	61.00
<b>16a</b>	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>b</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. . . . .	<b>16b</b>	
<b>c</b>	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.) . . . . .	<b>16c</b>	
<b>d</b>	Foreign tax credit. (See instructions.) . . . . .	<b>16d</b>	
<b>e</b>	Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) . . . . .	<b>16e</b>	
<b>f</b>	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.) . . . . .	<b>16f</b>	

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

# 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](http://www.irs.gov/form8621).

Name of shareholder <b>AMERICAN JEWISH COMMITTEE</b>		Identifying number (see instructions) <b>13-5563393</b>
Number, street, and room or suite no. (If a P.O. box, see instructions.) <b>165 EAST 56TH STREET</b>		Shareholder tax year: calendar year <b>2014</b> or other tax year beginning _____ and ending _____
City or town, state, and ZIP code or country <b>NEW YORK, NY 10022-2709</b>		
Check type of shareholder filing the return:	<input type="checkbox"/> Individual	<input type="checkbox"/> Corporation
	<input type="checkbox"/> Partnership	<input type="checkbox"/> S Corporation
	<input checked="" type="checkbox"/> Nongrantor Trust	<input type="checkbox"/> Estate
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) <b>GRESHAM CAPITAL CLO IV B.V.</b>		Employer identification number (if any) <b>N/A</b>
Address (Enter number, street, city or town, and country.) <b>RIVIERSTAETE BUILDING, AMSTELDIJK 166 1079 LH AMSTERDAM, THE NETHERLANDS</b>		Reference ID number (see instructions) <b>AJCGCCIVBV</b>
		Tax year of PFIC or QEF: calendar year <b>2014</b> 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 shareholder:

- Description of each class of shares held by the shareholder: VARIOUS - SEE STATEMENT 1  
 Check if shares jointly owned with spouse.
- Date shares acquired during the taxable year, if applicable: VARIOUS - SEE STATEMENT 1
- Number of shares held at the end of the taxable year: VARIOUS - SEE STATEMENT 1
- Value of shares held at the end of the taxable year (check the appropriate box, if applicable):  
(a)  \$0-50,000 (b)  \$50,001-100,000 (c)  \$100,001-150,000 (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 excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296:  
(a)  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 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 QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*  
**Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C**  **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D**  **Deemed Sale Election.** I, a shareholder on the first day of a PFIC's first tax 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 first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. *Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V.*
- F**  **Election To Recognize Gain on Deemed Sale of PFIC.** I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale 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.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*
- H**  **Deemed Dividend Election With Respect to a Former PFIC.** I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*

**Part III Income From a Qualified Electing Fund (QEF).** All QEF shareholders complete lines 6a through 7c. If you are making Election B, also complete lines 8a through 9c. (See instructions.)

<b>6a</b>	Enter your pro rata share of the ordinary earnings of the QEF . . . . .	<b>6a</b>		
<b>b</b>	Enter the portion of line 6a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>6b</b>		
<b>c</b>	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income . . . . .		<b>6c</b>	
<b>7a</b>	Enter your pro rata share of the total net capital gain of the QEF . . . . .	<b>7a</b>		
<b>b</b>	Enter the portion of line 7a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>7b</b>		
<b>c</b>	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.) . . . . .		<b>7c</b>	
<b>8a</b>	Add lines 6c and 7c. . . . .		<b>8a</b>	
<b>b</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.) . . . . .	<b>8b</b>		
<b>c</b>	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. . . . .	<b>8c</b>		
<b>d</b>	Add lines 8b and 8c. . . . .		<b>8d</b>	
<b>e</b>	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) . . . . .		<b>8e</b>	
	<b>Important:</b> 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.			
<b>9a</b>	Enter the total tax for the tax year (See instructions.) . . . . .	<b>9a</b>		
<b>b</b>	Enter the total tax for the tax year determined without regard to the amount entered on line 8e. . . . .	<b>9b</b>		
<b>c</b>	Subtract line 9b from line 9a. <b>This is the deferred tax, the time for payment of which is extended by making Election B. See instructions.</b> . . . . .		<b>9c</b>	

**Part IV Gain or (Loss) From Mark-to-Market Election (See instructions.)**

<b>10a</b>	Enter the fair market value of your PFIC stock at the end of the tax year . . . . .	<b>10a</b>	
<b>b</b>	Enter your adjusted basis in the stock at the end of the tax year . . . . .	<b>10b</b>	
<b>c</b>	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income on your tax return. If a loss, go to line 11 . . . . .		<b>10c</b>
<b>11</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>11</b>
<b>12</b>	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 . . . . .		<b>12</b>
<b>13</b>	<b>If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:</b>		
<b>a</b>	Enter the fair market value of the stock on the date of sale or disposition . . . . .	<b>13a</b>	
<b>b</b>	Enter the adjusted basis of the stock on the date of sale or disposition . . . . .	<b>13b</b>	
<b>c</b>	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 . . . . .		<b>13c</b>
<b>14a</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>14a</b>
<b>b</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. . . . .		<b>14b</b>
<b>c</b>	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 . . . . .		<b>14c</b>

**Note.** See instructions in case of multiple sales or dispositions.

**Part V Distributions From and Dispositions of Stock of a Section 1291 Fund** (See instructions.) SEE STATEMENT 1  
 Complete a **separate Part V** for each excess distribution and disposition (see instructions).

<b>15a</b>	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 . . . . .	<b>15a</b>	
<b>b</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) . . . . .	<b>15b</b>	
<b>c</b>	Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) . . . . .	<b>15c</b>	
<b>d</b>	Multiply line 15c by 125% (1.25). . . . .	<b>15d</b>	
<b>e</b>	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, <b>do not</b> 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 . . . . .	<b>15e</b>	
<b>f</b>	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 <b>do not</b> complete line 16 . . . . .	<b>15f</b>	
<b>16a</b>	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>b</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. . . . .	<b>16b</b>	
<b>c</b>	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.) . . . . .	<b>16c</b>	
<b>d</b>	Foreign tax credit. (See instructions.) . . . . .	<b>16d</b>	
<b>e</b>	Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) . . . . .	<b>16e</b>	
<b>f</b>	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.) . . . . .	<b>16f</b>	

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



**PARTNERSHIP NAME:** ANCHORAGE CAPITAL PARTNERS, LP  
**PARTNERSHIP EIN:** 20-0059325  
**INVESTOR NAME:** AMERICAN JEWISH COMMITTEE  
**INVESTOR EIN:** 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:		GRESHAM CAPITAL CLO IV B.V.	GRESHAM CAPITAL CLO IV B.V.
ADDRESS:		RIVIERSTAETE BUILDING AMSTELDIJK 166 1079 LH AMSTERDAM, THE NETHERLANDS	RIVIERSTAETE BUILDING AMSTELDIJK 166 1079 LH AMSTERDAM, THE NETHERLANDS
PFIC EIN:		N/A	N/A
PFIC TAX YEAR:		JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014
<b>PART I SUMMARY OF ANNUAL INFORMATION</b>			
LINE 1:	DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER		
LINE 2:	DATE SHARES ACQUIRED DURING THE TAXABLE YEAR, IF APPLICABLE		
LINE 3:	NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR		
LINE 4:	VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR		
LINE 5:	TYPE OF PFIC		
LINE 5A/B/C:	INCOME INCLUSION		
<b>PART V DISTRIBUTIONS FROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND</b>			
LINE 15A (NOTE 1):	TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR		
LINE 15B:	TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEEDING THE CURRENT TAX YEAR		
LINE 15E:	EXCESS DISTRIBUTION DATE OF SALE		
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		
		SUBORDINATED NOTES	SUBORDINATED NOTES
		N/A	N/A
		1,694	824
		\$ 603	\$ 293
		SECTION 1291	SECTION 1291
		\$ 337	\$ 139
		2/14/2012	10/24/2012
		\$ -	\$ -
		\$ -	\$ -
		\$ -	\$ -
		1/1/2014 - DEEMED SALE	1/1/2014 - DEEMED SALE
		\$ 97	\$ 72
		\$ 337	\$ 139
		\$ -	\$ -

(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.

# 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](http://www.irs.gov/form8621).

Name of shareholder <b>AMERICAN JEWISH COMMITTEE</b>		Identifying number (see instructions) <b>13-5563393</b>				
Number, street, and room or suite no. (If a P.O. box, see instructions.) <b>165 EAST 56TH STREET</b>		Shareholder tax year: calendar year <b>2014</b> or other tax year beginning and ending				
City or town, state, and ZIP code or country <b>NEW YORK, NY 10022-2709</b>						
Check type of shareholder filing the return:	<input type="checkbox"/> Individual	<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Partnership	<input type="checkbox"/> S Corporation	<input type="checkbox"/> Nongrantor Trust	<input type="checkbox"/> Estate
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) <b>HARVEST CLO I.S.A</b>		Employer identification number (if any) <b>N/A</b>				
Address (Enter number, street, city or town, and country.) <b>C/O TMF LUXEMBOURG, 46A AVENUE, J.F. KENNEDY L-1855 LUXEMBOURG</b>		Reference ID number (see instructions) <b>AJCHCISA</b>				
		Tax year of PFIC or QEF: calendar year <b>2014</b> 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 shareholder:

- Description of each class of shares held by the shareholder: CLASS F SUBORDINATED NOTES  
 Check if shares jointly owned with spouse.
- Date shares acquired during the taxable year, if applicable: N/A
- Number of shares held at the end of the taxable year: 1339
- Value of shares held at the end of the taxable year (check the appropriate box, if applicable):  
(a)  \$0-50,000 (b)  \$50,001-100,000 (c)  \$100,001-150,000 (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 excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296:  
(a)  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 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 QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*  
**Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C**  **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D**  **Deemed Sale Election.** I, a shareholder on the first day of a PFIC's first tax 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 first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. *Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V.*
- F**  **Election To Recognize Gain on Deemed Sale of PFIC.** I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale 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.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*
- H**  **Deemed Dividend Election With Respect to a Former PFIC.** I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*

**Part III Income From a Qualified Electing Fund (QEF).** All QEF shareholders complete lines 6a through 7c. If you are making Election B, also complete lines 8a through 9c. (See instructions.)

<b>6a</b>	Enter your pro rata share of the ordinary earnings of the QEF . . . . .	<b>6a</b>		
<b>b</b>	Enter the portion of line 6a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>6b</b>		
<b>c</b>	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income . . . . .		<b>6c</b>	
<b>7a</b>	Enter your pro rata share of the total net capital gain of the QEF . . . . .	<b>7a</b>		
<b>b</b>	Enter the portion of line 7a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>7b</b>		
<b>c</b>	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.) . . . . .		<b>7c</b>	
<b>8a</b>	Add lines 6c and 7c. . . . .		<b>8a</b>	
<b>b</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.) . . . . .	<b>8b</b>		
<b>c</b>	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. . . . .	<b>8c</b>		
<b>d</b>	Add lines 8b and 8c. . . . .		<b>8d</b>	
<b>e</b>	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) . . . . .		<b>8e</b>	
	<b>Important:</b> 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.			
<b>9a</b>	Enter the total tax for the tax year (See instructions.) . . . . .	<b>9a</b>		
<b>b</b>	Enter the total tax for the tax year determined without regard to the amount entered on line 8e. . . . .	<b>9b</b>		
<b>c</b>	Subtract line 9b from line 9a. <b>This is the deferred tax, the time for payment of which is extended by making Election B. See instructions.</b> . . . . .		<b>9c</b>	

**Part IV Gain or (Loss) From Mark-to-Market Election (See instructions.)**

<b>10a</b>	Enter the fair market value of your PFIC stock at the end of the tax year . . . . .	<b>10a</b>	
<b>b</b>	Enter your adjusted basis in the stock at the end of the tax year . . . . .	<b>10b</b>	
<b>c</b>	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income on your tax return. If a loss, go to line 11 . . . . .		<b>10c</b>
<b>11</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>11</b>
<b>12</b>	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 . . . . .		<b>12</b>
<b>13</b>	<b>If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:</b>		
<b>a</b>	Enter the fair market value of the stock on the date of sale or disposition . . . . .	<b>13a</b>	
<b>b</b>	Enter the adjusted basis of the stock on the date of sale or disposition . . . . .	<b>13b</b>	
<b>c</b>	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 . . . . .		<b>13c</b>
<b>14a</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>14a</b>
<b>b</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. . . . .		<b>14b</b>
<b>c</b>	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 . . . . .		<b>14c</b>

**Note.** See instructions in case of multiple sales or dispositions.

**Part V Distributions From and Dispositions of Stock of a Section 1291 Fund** (See instructions.)  
 Complete a **separate Part V** for each excess distribution and disposition (see instructions).

<b>15a</b>	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 . . . . .	<b>15a</b>	0.00
<b>b</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) . . . . .	<b>15b</b>	0.00
<b>c</b>	Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) . . . . .	<b>15c</b>	
<b>d</b>	Multiply line 15c by 125% (1.25). . . . .	<b>15d</b>	
<b>e</b>	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, <b>do not</b> 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 . . . . .	<b>15e</b>	
<b>f</b>	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 <b>do not</b> complete line 16 . . . . .	<b>15f</b>	61.00
<b>16a</b>	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>b</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. . . . .	<b>16b</b>	
<b>c</b>	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.) . . . . .	<b>16c</b>	
<b>d</b>	Foreign tax credit. (See instructions.) . . . . .	<b>16d</b>	
<b>e</b>	Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) . . . . .	<b>16e</b>	
<b>f</b>	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.) . . . . .	<b>16f</b>	

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

**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](http://www.irs.gov/form8621).

Name of shareholder <b>AMERICAN JEWISH COMMITTEE</b>		Identifying number (see instructions) <b>13-5563393</b>	
Number, street, and room or suite no. (If a P.O. box, see instructions.) <b>165 EAST 56TH STREET</b>		Shareholder tax year: calendar year <b>2014</b> or other tax year beginning and ending	
City or town, state, and ZIP code or country <b>NEW YORK, NY 10022-2709</b>			
Check type of shareholder filing the return: <input type="checkbox"/> Individual <input type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input checked="" type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate			
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) <b>MAV 2 LIQUIDATION TRUST</b>		Employer identification number (if any) <b>N/A</b>	
Address (Enter number, street, city or town, and country.) <b>COMPUTERSHRE TRUST COMPANY OF CANADA, IN ITS CAPACITY AS ISSUER TRUSTEE OF MASTER ASSET VEHICLE II 100 UNIVERSITY AVENUE, 8TH FLOOR, TORONTO, ONTARIO M5J 2Y1, CANADA</b>		Reference ID number (see instructions) <b>AJCMV2</b>	
		Tax year of PFIC or QEF: calendar year <b>2014</b> 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 shareholder:

- 1 Description of each class of shares held by the shareholder: LIQUIDATION TRUST UNITS  
 Check if shares jointly owned with spouse.
- 2 Date shares acquired during the taxable year, if applicable: VARIOUS SEE ATTACHMENT 1
- 3 Number of shares held at the end of the taxable year: VARIOUS SEE ATTACHMENT 1
- 4 Value of shares held at the end of the taxable year (check the appropriate box, if applicable):  
 (a)  \$0-50,000 (b)  \$50,001-100,000 (c)  \$100,001-150,000 (d)  \$150,001-200,000  
 (e) If more than \$200,000, list value: \_\_\_\_\_
- 5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296:  
 (a)  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 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 QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*  
**Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C  **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D  **Deemed Sale Election.** I, a shareholder on the first day of a PFIC's first tax 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 first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. *Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V.*
- F  **Election To Recognize Gain on Deemed Sale of PFIC.** I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale 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.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*
- H  **Deemed Dividend Election With Respect to a Former PFIC.** I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*

**Part III Income From a Qualified Electing Fund (QEF).** All QEF shareholders complete lines 6a through 7c. If you are making Election B, also complete lines 8a through 9c. (See instructions.)

<b>6a</b>	Enter your pro rata share of the ordinary earnings of the QEF . . . . .	<b>6a</b>		
<b>b</b>	Enter the portion of line 6a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>6b</b>		
<b>c</b>	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income . . . . .		<b>6c</b>	
<b>7a</b>	Enter your pro rata share of the total net capital gain of the QEF . . . . .	<b>7a</b>		
<b>b</b>	Enter the portion of line 7a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>7b</b>		
<b>c</b>	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.) . . . . .		<b>7c</b>	
<b>8a</b>	Add lines 6c and 7c. . . . .		<b>8a</b>	
<b>b</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.) . . . . .	<b>8b</b>		
<b>c</b>	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. . . . .	<b>8c</b>		
<b>d</b>	Add lines 8b and 8c. . . . .		<b>8d</b>	
<b>e</b>	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) . . . . .		<b>8e</b>	
	<b>Important:</b> 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.			
<b>9a</b>	Enter the total tax for the tax year (See instructions.) . . . . .	<b>9a</b>		
<b>b</b>	Enter the total tax for the tax year determined without regard to the amount entered on line 8e. . . . .	<b>9b</b>		
<b>c</b>	Subtract line 9b from line 9a. <b>This is the deferred tax, the time for payment of which is extended by making Election B. See instructions.</b> . . . . .		<b>9c</b>	

**Part IV Gain or (Loss) From Mark-to-Market Election (See instructions.)**

<b>10a</b>	Enter the fair market value of your PFIC stock at the end of the tax year . . . . .	<b>10a</b>	
<b>b</b>	Enter your adjusted basis in the stock at the end of the tax year . . . . .	<b>10b</b>	
<b>c</b>	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income on your tax return. If a loss, go to line 11 . . . . .		<b>10c</b>
<b>11</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>11</b>
<b>12</b>	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 . . . . .		<b>12</b>
<b>13</b>	<b>If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:</b>		
<b>a</b>	Enter the fair market value of the stock on the date of sale or disposition . . . . .	<b>13a</b>	
<b>b</b>	Enter the adjusted basis of the stock on the date of sale or disposition . . . . .	<b>13b</b>	
<b>c</b>	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 . . . . .		<b>13c</b>
<b>14a</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>14a</b>
<b>b</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. . . . .		<b>14b</b>
<b>c</b>	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 . . . . .		<b>14c</b>

**Note.** See instructions in case of multiple sales or dispositions.

**Part V Distributions From and Dispositions of Stock of a Section 1291 Fund** (See instructions.) SEE ATTACHMENT 1  
 Complete a **separate Part V** for each excess distribution and disposition (see instructions).

<b>15a</b> 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 . . . . .	<b>15a</b>	
<b>b</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) . . . . .	<b>15b</b>	
<b>c</b> Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) . . . . .	<b>15c</b>	
<b>d</b> Multiply line 15c by 125% (1.25). . . . .	<b>15d</b>	
<b>e</b> 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, <b>do not</b> 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 . . . . .	<b>15e</b>	
<b>f</b> 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 <b>do not</b> complete line 16 . . . . .	<b>15f</b>	
<b>16a</b> 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>b</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. . . . .	<b>16b</b>	
<b>c</b> 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.) . . . . .	<b>16c</b>	
<b>d</b> Foreign tax credit. (See instructions.) . . . . .	<b>16d</b>	
<b>e</b> Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) . . . . .	<b>16e</b>	
<b>f</b> 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.) . . . . .	<b>16f</b>	

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

**PARTNERSHIP NAME:** ANCHORAGE CAPITAL PARTNERS, LP  
**PARTNERSHIP EIN:** 20-0059325  
**INVESTOR NAME:** AMERICAN JEWISH COMMITTEE  
**INVESTOR EIN:** 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:	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 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:	N/A	N/A	N/A
PFIC TAX YEAR:	JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014
<b>PART I SUMMARY OF ANNUAL INFORMATION</b>			
LINE 1: DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER	LIQUIDATION TRUST UNITS	LIQUIDATION TRUST UNITS	LIQUIDATION TRUST UNITS
LINE 2: DATE SHARES ACQUIRED DURING THE TAXABLE YEAR, IF APPLICABLE	2/19/2014	2/19/2014	2/19/2014
LINE 3: NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR	258	2,514	14,685
LINE 4: VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR	\$ 6	\$ 57	\$ 333
LINE 5: TYPE OF PFIC	SECTION 1291	SECTION 1291	SECTION 1291
LINE 5A/B/C: INCOME INCLUSION	\$ -	\$ -	\$ -
<b>PART V DISTRIBUTIONS FROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND</b>			
LINE 15A (NOTE 1): DATE OF ACQUISITION	2/19/2014	2/19/2014	2/19/2014
LINE 15B: TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR	\$ -	\$ -	\$ -
LINE 15C: TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEDING THE CURRENT TAX YEAR	\$ -	\$ -	\$ -
LINE 15D: EXCESS DISTRIBUTION	\$ -	\$ -	\$ -
LINE 15E: DATE OF SALE	\$ -	\$ -	\$ -
LINE 15F (NOTE 2): COST BASIS	\$ -	\$ -	\$ -
LINE 15G: GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND	\$ -	\$ -	\$ -
LINE 15H: 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.

(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.



**PARTNERSHIP NAME:** ANCHORAGE CAPITAL PARTNERS, LP  
**PARTNERSHIP EIN:** 20-0059325  
**INVESTOR NAME:** AMERICAN JEWISH COMMITTEE  
**INVESTOR EIN:** 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:	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 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:	N/A	N/A	N/A
PFIC TAX YEAR:	JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014
<b>PART I SUMMARY OF ANNUAL INFORMATION</b>			
LINE 1: DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER	LIQUIDATION TRUST UNITS	LIQUIDATION TRUST UNITS	LIQUIDATION TRUST UNITS
LINE 2: DATE SHARES ACQUIRED DURING THE TAXABLE YEAR, IF APPLICABLE	3/20/2014	3/20/2014	5/29/2014
LINE 3: NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR	46	1,557	150
LINE 4: VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR	\$ 1	\$ 35	\$ 3
LINE 5: TYPE OF PFIC	SECTION 1291	SECTION 1291	SECTION 1291
LINE 5A/B/C: INCOME INCLUSION	\$ -	\$ -	\$ -
<b>PART V DISTRIBUTIONS FROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND</b>			
LINE 15A (NOTE 1): DATE OF ACQUISITION	3/20/2014	3/20/2014	5/29/2014
LINE 15B: TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR	\$ -	\$ -	\$ -
LINE 15C: TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEDING THE CURRENT TAX YEAR	\$ -	\$ -	\$ -
LINE 15D: EXCESS DISTRIBUTION	\$ -	\$ -	\$ -
LINE 15E: DATE OF SALE	\$ -	\$ -	\$ -
LINE 15F (NOTE 2): COST BASIS	\$ -	\$ -	\$ -
LINE 15G (NOTE 2): GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND	\$ -	\$ -	\$ -
LINE 15H (NOTE 2): 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.

(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.

**PARTNERSHIP NAME:** ANCHORAGE CAPITAL PARTNERS, LP  
**PARTNERSHIP EIN:** 20-0059325  
**INVESTOR NAME:** AMERICAN JEWISH COMMITTEE  
**INVESTOR EIN:** 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:		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:		N/A	N/A
PFIC TAX YEAR:		JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014
<b>PART I SUMMARY OF ANNUAL INFORMATION</b>			
LINE 1:	DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER	LIQUIDATION TRUST UNITS	LIQUIDATION TRUST UNITS
LINE 2:	DATE SHARES ACQUIRED DURING THE TAXABLE YEAR, IF APPLICABLE	N/A	N/A
LINE 3:	NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR	21,057	23,070
LINE 4:	VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR	\$ 480	\$ 526
LINE 5:	TYPE OF PFIC	SECTION 1291	SECTION 1291
LINE 5A/B/C:	INCOME INCLUSION	\$ -	\$ -
<b>PART V DISTRIBUTIONS FROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND</b>			
	DATE OF ACQUISITION	12/17/2013	12/17/2013
LINE 15A (NOTE 1):	TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR	\$ -	\$ -
LINE 15B:	TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEEDING THE CURRENT TAX YEAR	\$ -	\$ -
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.

(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.

**PARTNERSHIP NAME:** ANCHORAGE CAPITAL PARTNERS, LP  
**PARTNERSHIP EIN:** 20-0059325  
**INVESTOR NAME:** AMERICAN JEWISH COMMITTEE  
**INVESTOR EIN:** 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:	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:	N/A	N/A
PFIC TAX YEAR:	JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014
<b>PART I SUMMARY OF ANNUAL INFORMATION</b>		
LINE 1: DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER	LIQUIDATION TRUST UNITS	LIQUIDATION TRUST UNITS
LINE 2: DATE SHARES ACQUIRED DURING THE TAXABLE YEAR, IF APPLICABLE	N/A	N/A
LINE 3: NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR	2,890	1,232
LINE 4: VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR	\$ 66	\$ 28
LINE 5: TYPE OF PFIC	SECTION 1291	SECTION 1291
LINE 5A/B/C: INCOME INCLUSION	\$ -	\$ -
<b>PART V DISTRIBUTIONS FROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND</b>		
LINE 15A (NOTE 1): DATE OF ACQUISITION	12/17/2013	12/17/2013
LINE 15B: TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR	\$ -	\$ -
LINE 15C: TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEDING THE CURRENT TAX YEAR	\$ -	\$ -
LINE 15D: EXCESS DISTRIBUTION	\$ -	\$ -
LINE 15E: DATE OF SALE	\$ -	\$ -
LINE 15F (NOTE 2): COST BASIS	\$ -	\$ -
LINE 15G: GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND	\$ -	\$ -
LINE 15H: 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.

(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.

**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](http://www.irs.gov/form8621).

Name of shareholder <b>AMERICAN JEWISH COMMITTEE</b>		Identifying number (see instructions) <b>13-5563393</b>	
Number, street, and room or suite no. (If a P.O. box, see instructions.) <b>165 EAST 56TH STREET</b>		Shareholder tax year: calendar year <b>2014</b> or other tax year beginning _____ and ending _____	
City or town, state, and ZIP code or country <b>NEW YORK, NY 10022-2709</b>			
Check type of shareholder filing the return:	<input type="checkbox"/> Individual	<input type="checkbox"/> Corporation	<input type="checkbox"/> Partnership
	<input type="checkbox"/> S Corporation	<input type="checkbox"/> Nongrantor Trust	<input type="checkbox"/> Estate
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) <b>NEW COTAI PARTICIPATION CORP.</b>		Employer identification number (if any) <b>98-1097222</b>	
Address (Enter number, street, city or town, and country.) <b>COMMERCE HOUSE, WICKHAMS CY 1 PO BOX 3140, ROAD TOWN, TORTOLA VG1110 BRITISH VIRGINIA ISLANDS</b>		Reference ID number (see instructions) <b>AJCNPC</b>	
		Tax year of PFIC or QEF: calendar year <b>2014</b> 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 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
- 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 box, if applicable):  
 (a)  \$0-50,000 (b)  \$50,001-100,000 (c)  \$100,001-150,000 (d)  \$150,001-200,000  
 (e) If more than \$200,000, list value: \_\_\_\_\_
- 5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296:  
 (a)  Section 1291 \$ 0.00  
 (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 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 QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*  
**Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C**  **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D**  **Deemed Sale Election.** I, a shareholder on the first day of a PFIC's first tax 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 first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. *Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V.*
- F**  **Election To Recognize Gain on Deemed Sale of PFIC.** I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale 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.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*
- H**  **Deemed Dividend Election With Respect to a Former PFIC.** I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*

**Part III Income From a Qualified Electing Fund (QEF).** All QEF shareholders complete lines 6a through 7c. If you are making Election B, also complete lines 8a through 9c. (See instructions.)

<b>6a</b>	Enter your pro rata share of the ordinary earnings of the QEF . . . . .	<b>6a</b>		
<b>b</b>	Enter the portion of line 6a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>6b</b>		
<b>c</b>	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income . . . . .		<b>6c</b>	
<b>7a</b>	Enter your pro rata share of the total net capital gain of the QEF . . . . .	<b>7a</b>		
<b>b</b>	Enter the portion of line 7a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>7b</b>		
<b>c</b>	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.) . . . . .		<b>7c</b>	
<b>8a</b>	Add lines 6c and 7c. . . . .		<b>8a</b>	
<b>b</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.) . . . . .	<b>8b</b>		
<b>c</b>	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. . . . .	<b>8c</b>		
<b>d</b>	Add lines 8b and 8c. . . . .		<b>8d</b>	
<b>e</b>	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) . . . . .		<b>8e</b>	
	<b>Important:</b> 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.			
<b>9a</b>	Enter the total tax for the tax year (See instructions.) . . . . .	<b>9a</b>		
<b>b</b>	Enter the total tax for the tax year determined without regard to the amount entered on line 8e. . . . .	<b>9b</b>		
<b>c</b>	Subtract line 9b from line 9a. <b>This is the deferred tax, the time for payment of which is extended by making Election B. See instructions.</b> . . . . .		<b>9c</b>	

**Part IV Gain or (Loss) From Mark-to-Market Election (See instructions.)**

<b>10a</b>	Enter the fair market value of your PFIC stock at the end of the tax year . . . . .	<b>10a</b>	
<b>b</b>	Enter your adjusted basis in the stock at the end of the tax year . . . . .	<b>10b</b>	
<b>c</b>	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income on your tax return. If a loss, go to line 11 . . . . .		<b>10c</b>
<b>11</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>11</b>
<b>12</b>	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 . . . . .		<b>12</b>
<b>13</b>	<b>If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:</b>		
<b>a</b>	Enter the fair market value of the stock on the date of sale or disposition . . . . .	<b>13a</b>	
<b>b</b>	Enter the adjusted basis of the stock on the date of sale or disposition . . . . .	<b>13b</b>	
<b>c</b>	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 . . . . .		<b>13c</b>
<b>14a</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>14a</b>
<b>b</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. . . . .		<b>14b</b>
<b>c</b>	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 . . . . .		<b>14c</b>

**Note.** See instructions in case of multiple sales or dispositions.

**Part V Distributions From and Dispositions of Stock of a Section 1291 Fund** (See instructions.)  
 Complete a **separate Part V** for each excess distribution and disposition (see instructions).

<b>15a</b>	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 . . . . .	<b>15a</b>	0.00
<b>b</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) . . . . .	<b>15b</b>	
<b>c</b>	Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) . . . . .	<b>15c</b>	
<b>d</b>	Multiply line 15c by 125% (1.25). . . . .	<b>15d</b>	
<b>e</b>	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, <b>do not</b> 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 . . . . .	<b>15e</b>	0.00
<b>f</b>	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 <b>do not</b> complete line 16 . . . . .	<b>15f</b>	
<b>16a</b>	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>b</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. . . . .	<b>16b</b>	
<b>c</b>	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.) . . . . .	<b>16c</b>	
<b>d</b>	Foreign tax credit. (See instructions.) . . . . .	<b>16d</b>	
<b>e</b>	Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) . . . . .	<b>16e</b>	
<b>f</b>	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.) . . . . .	<b>16f</b>	

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

**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](http://www.irs.gov/form8621).

Name of shareholder <b>AMERICAN JEWISH COMMITTEE</b>		Identifying number (see instructions) <b>13-5563393</b>	
Number, street, and room or suite no. (If a P.O. box, see instructions.) <b>165 EAST 56TH STREET</b>		Shareholder tax year: calendar year <b>2014</b> or other tax year beginning and ending	
City or town, state, and ZIP code or country <b>NEW YORK, NY 10022-2709</b>			
Check type of shareholder filing the return:	<input type="checkbox"/> Individual	<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Partnership
			<input type="checkbox"/> S Corporation
			<input type="checkbox"/> Nongrantor Trust
			<input type="checkbox"/> Estate
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) <b>ROCKWALL CDO II LTD.</b>		Employer identification number (if any) <b>N/A</b>	
Address (Enter number, street, city or town, and country.) <b>C/O MAPLES FS LIMITED, PO BOX 1093, BOUNDARY HALL, CRICKET SQUARE, GRAND CAYMAN KY1-1102, CAYMAN ISLANDS</b>		Reference ID number (see instructions) <b>AJCRCIIL</b>	
		Tax year of PFIC or QEF: calendar year <b>2014</b> 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 shareholder:

- 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 box, if applicable):  
 (a)  \$0-50,000 (b)  \$50,001-100,000 (c)  \$100,001-150,000 (d)  \$150,001-200,000  
 (e) If more than \$200,000, list value: \_\_\_\_\_
- 5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296:  
 (a)  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 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 QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*  
**Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C  **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D  **Deemed Sale Election.** I, a shareholder on the first day of a PFIC's first tax 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 first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. *Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V.*
- F  **Election To Recognize Gain on Deemed Sale of PFIC.** I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale 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.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*
- H  **Deemed Dividend Election With Respect to a Former PFIC.** I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*

**Part III Income From a Qualified Electing Fund (QEF).** All QEF shareholders complete lines 6a through 7c. If you are making Election B, also complete lines 8a through 9c. (See instructions.)

<b>6a</b>	Enter your pro rata share of the ordinary earnings of the QEF . . . . .	<b>6a</b>		
<b>b</b>	Enter the portion of line 6a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>6b</b>		
<b>c</b>	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income . . . . .		<b>6c</b>	
<b>7a</b>	Enter your pro rata share of the total net capital gain of the QEF . . . . .	<b>7a</b>		
<b>b</b>	Enter the portion of line 7a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>7b</b>		
<b>c</b>	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.) . . . . .		<b>7c</b>	
<b>8a</b>	Add lines 6c and 7c. . . . .		<b>8a</b>	
<b>b</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.) . . . . .	<b>8b</b>		
<b>c</b>	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. . . . .	<b>8c</b>		
<b>d</b>	Add lines 8b and 8c. . . . .		<b>8d</b>	
<b>e</b>	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) . . . . .		<b>8e</b>	
	<b>Important:</b> 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.			
<b>9a</b>	Enter the total tax for the tax year (See instructions.) . . . . .	<b>9a</b>		
<b>b</b>	Enter the total tax for the tax year determined without regard to the amount entered on line 8e. . . . .	<b>9b</b>		
<b>c</b>	Subtract line 9b from line 9a. <b>This is the deferred tax, the time for payment of which is extended by making Election B. See instructions.</b> . . . . .		<b>9c</b>	

**Part IV Gain or (Loss) From Mark-to-Market Election (See instructions.)**

<b>10a</b>	Enter the fair market value of your PFIC stock at the end of the tax year . . . . .	<b>10a</b>	
<b>b</b>	Enter your adjusted basis in the stock at the end of the tax year . . . . .	<b>10b</b>	
<b>c</b>	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income on your tax return. If a loss, go to line 11 . . . . .		<b>10c</b>
<b>11</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>11</b>
<b>12</b>	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 . . . . .		<b>12</b>
<b>13</b>	<b>If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:</b>		
<b>a</b>	Enter the fair market value of the stock on the date of sale or disposition . . . . .	<b>13a</b>	
<b>b</b>	Enter the adjusted basis of the stock on the date of sale or disposition . . . . .	<b>13b</b>	
<b>c</b>	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 . . . . .		<b>13c</b>
<b>14a</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>14a</b>
<b>b</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. . . . .		<b>14b</b>
<b>c</b>	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 . . . . .		<b>14c</b>

**Note.** See instructions in case of multiple sales or dispositions.



**Part V Distributions From and Dispositions of Stock of a Section 1291 Fund** (See instructions.) SEE STATEMENT 1  
 Complete a **separate Part V** for each excess distribution and disposition (see instructions).

<b>15a</b>	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 . . . . .	<b>15a</b>	
<b>b</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) . . . . .	<b>15b</b>	
<b>c</b>	Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) . . . . .	<b>15c</b>	
<b>d</b>	Multiply line 15c by 125% (1.25). . . . .	<b>15d</b>	
<b>e</b>	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, <b>do not</b> 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 . . . . .	<b>15e</b>	
<b>f</b>	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 <b>do not</b> complete line 16 . . . . .	<b>15f</b>	
<b>16a</b>	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>b</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. . . . .	<b>16b</b>	
<b>c</b>	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.) . . . . .	<b>16c</b>	
<b>d</b>	Foreign tax credit. (See instructions.) . . . . .	<b>16d</b>	
<b>e</b>	Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) . . . . .	<b>16e</b>	
<b>f</b>	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.) . . . . .	<b>16f</b>	

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

**PARTNERSHIP NAME:** ANCHORAGE CAPITAL PARTNERS, LP  
**PARTNERSHIP EIN:** 20-0059325  
**INVESTOR NAME:** AMERICAN JEWISH COMMITTEE  
**INVESTOR EIN:** 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:	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 ISLANDS	C/O MAPLESFS LIMITED, P.O. BOX 1093 BOUNDARY HALL, CRICKET SQUARE GRAND CAYMAN KY1-1102, CAYMAN ISLANDS
PFIC EIN:	N/A	N/A	N/A
PFIC TAX YEAR:	JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014	JANUARY 1, 2014 - DECEMBER 31, 2014
<b>PART I SUMMARY OF ANNUAL INFORMATION</b>			
LINE 1: DESCRIPTION OF EACH CLASS OF SHARES HELD BY THE SHAREHOLDER	PREFERRED SHARES	PREFERRED SHARES	PREFERRED SHARES
LINE 2: DATE SHARES ACQUIRED DURING THE TAXABLE YEAR, IF APPLICABLE	N/A	N/A	N/A
LINE 3: NUMBER OF SHARES HELD AT THE END OF THE TAXABLE YEAR	418	7,879	2,742
LINE 4: VALUE OF SHARES HELD AT THE END OF THE TAXABLE YEAR	\$ 325	\$ 6,123	\$ 2,131
LINE 5: TYPE OF PFIC	SECTION 1291	SECTION 1291	SECTION 1291
LINE 5A/B/C: INCOME INCLUSION	\$ -	\$ 4,586	\$ 1,161
<b>PART V DISTRIBUTIONS FROM AND DISPOSITIONS OF STOCK OF A SECTION 1291 FUND</b>			
LINE 15A (NOTE 1): DATE OF ACQUISITION	9/20/2012	4/8/2010	4/29/2011
LINE 15B: TOTAL DISTRIBUTIONS DURING THE CURRENT TAX YEAR	\$ -	\$ -	\$ -
LINE 15C: TOTAL DISTRIBUTIONS FOR EACH OF THE 3 YEARS PRECEDING THE CURRENT TAX YEAR	\$ -	\$ -	\$ -
LINE 15D: EXCESS DISTRIBUTION	\$ -	\$ -	\$ -
LINE 15E: DATE OF SALE	1/1/2014 - DEEMED SALE	1/1/2014 - DEEMED SALE	1/1/2014 - DEEMED SALE
LINE 15F (NOTE 2): COST BASIS	\$ 316	\$ 563	\$ 631
LINE 15G (NOTE 2): GAIN FROM DISPOSITION OF STOCK OF A SECTION 1291 FUND OR FORMER SECTION 1291 FUND	\$ -	\$ 4,586	\$ 1,161
LINE 15H (NOTE 2): 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.

(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.

**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](http://www.irs.gov/form8621).

Name of shareholder <b>AMERICAN JEWISH COMMITTEE</b>		Identifying number (see instructions) <b>13-5563393</b>	
Number, street, and room or suite no. (If a P.O. box, see instructions.) <b>165 EAST 56TH STREET</b>		Shareholder tax year: calendar year <b>2014</b> or other tax year beginning _____ and ending _____	
City or town, state, and ZIP code or country <b>NEW YORK, NY 10022-2709</b>			
Check type of shareholder filing the return: Individual <input type="checkbox"/> Corporation <input checked="" type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate <input type="checkbox"/>			
Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) <b>ZAIS INVESTMENT GRADE LIMITED VII</b>		Employer identification number (if any) <b>N/A</b>	
Address (Enter number, street, city or town, and country.) <b>C/O MAPLES FINANCE LIMITED, PO BOX 1093GT QUEENSGATE HOUSE, SOUTH CHURCH ST GEORGE TOWN GRAND CAYMAN, CAYMAN ISLANDS</b>		Reference ID number (see instructions) <b>AJCZIGLVII</b>	
		Tax year of PFIC or QEF: calendar year <b>2014</b> 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 shareholder:

- 1 Description of each class of shares held by the shareholder: **INCOME 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: **1039**
- 4 Value of shares held at the end of the taxable year (check the appropriate box, if applicable):  
 (a)  \$0-50,000 (b)  \$50,001-100,000 (c)  \$100,001-150,000 (d)  \$150,001-200,000  
 (e) If more than \$200,000, list value: \_\_\_\_\_
- 5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, or inclusion or deduction under section 1296:  
 (a)  Section 1291 \$ **0.00**  
 (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 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 QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. *Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.*  
**Note:** If any portion of line 6a or line 7a of Part III is includible under section 951, you may **not** make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
- C**  **Election To Mark-to-Market PFIC Stock.** I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). *Complete Part IV.*
- D**  **Deemed Sale Election.** I, a shareholder on the first day of a PFIC's first tax 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 first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. *Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V.*
- F**  **Election To Recognize Gain on Deemed Sale of PFIC.** I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale 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.** I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*
- H**  **Deemed Dividend Election With Respect to a Former PFIC.** I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). *Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.*

**Part III Income From a Qualified Electing Fund (QEF).** All QEF shareholders complete lines 6a through 7c. If you are making Election B, also complete lines 8a through 9c. (See instructions.)

<b>6a</b>	Enter your pro rata share of the ordinary earnings of the QEF . . . . .	<b>6a</b>		
<b>b</b>	Enter the portion of line 6a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>6b</b>		
<b>c</b>	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income . . . . .		<b>6c</b>	
<b>7a</b>	Enter your pro rata share of the total net capital gain of the QEF . . . . .	<b>7a</b>		
<b>b</b>	Enter the portion of line 7a that is included in income under section 951 or that may be excluded under section 1293(g) . . . . .	<b>7b</b>		
<b>c</b>	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.) . . . . .		<b>7c</b>	
<b>8a</b>	Add lines 6c and 7c. . . . .		<b>8a</b>	
<b>b</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.) . . . . .	<b>8b</b>		
<b>c</b>	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. . . . .	<b>8c</b>		
<b>d</b>	Add lines 8b and 8c. . . . .		<b>8d</b>	
<b>e</b>	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brackets) . . . . .		<b>8e</b>	
	<b>Important:</b> 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.			
<b>9a</b>	Enter the total tax for the tax year (See instructions.) . . . . .	<b>9a</b>		
<b>b</b>	Enter the total tax for the tax year determined without regard to the amount entered on line 8e. . . . .	<b>9b</b>		
<b>c</b>	Subtract line 9b from line 9a. <b>This is the deferred tax, the time for payment of which is extended by making Election B. See instructions.</b> . . . . .		<b>9c</b>	

**Part IV Gain or (Loss) From Mark-to-Market Election (See instructions.)**

<b>10a</b>	Enter the fair market value of your PFIC stock at the end of the tax year . . . . .	<b>10a</b>	
<b>b</b>	Enter your adjusted basis in the stock at the end of the tax year . . . . .	<b>10b</b>	
<b>c</b>	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount as ordinary income on your tax return. If a loss, go to line 11 . . . . .		<b>10c</b>
<b>11</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>11</b>
<b>12</b>	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 . . . . .		<b>12</b>
<b>13</b>	<b>If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:</b>		
<b>a</b>	Enter the fair market value of the stock on the date of sale or disposition . . . . .	<b>13a</b>	
<b>b</b>	Enter the adjusted basis of the stock on the date of sale or disposition . . . . .	<b>13b</b>	
<b>c</b>	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 . . . . .		<b>13c</b>
<b>14a</b>	Enter any unreversed inclusions (as defined in section 1296(d)) . . . . .		<b>14a</b>
<b>b</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. . . . .		<b>14b</b>
<b>c</b>	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 . . . . .		<b>14c</b>

**Note.** See instructions in case of multiple sales or dispositions.

**Part V Distributions From and Dispositions of Stock of a Section 1291 Fund** (See instructions.)  
 Complete a **separate Part V** for each excess distribution and disposition (see instructions).

<b>15a</b>	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 . . . . .	<b>15a</b>	0.00
<b>b</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) . . . . .	<b>15b</b>	0.00
<b>c</b>	Divide line 15b by 3. (See instructions if the number of preceding tax years is less than 3.) . . . . .	<b>15c</b>	
<b>d</b>	Multiply line 15c by 125% (1.25). . . . .	<b>15d</b>	
<b>e</b>	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, <b>do not</b> 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 . . . . .	<b>15e</b>	
<b>f</b>	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 <b>do not</b> complete line 16 . . . . .	<b>15f</b>	0.00
<b>16a</b>	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>b</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. . . . .	<b>16b</b>	
<b>c</b>	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.) . . . . .	<b>16c</b>	
<b>d</b>	Foreign tax credit. (See instructions.) . . . . .	<b>16d</b>	
<b>e</b>	Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." (See instructions.) . . . . .	<b>16e</b>	
<b>f</b>	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.) . . . . .	<b>16f</b>	

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

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

Department of the Treasury  
Internal Revenue Service

► Information about Form 926 and its separate instructions is at [www.irs.gov/form926](http://www.irs.gov/form926).  
► Attach to your income tax return for the year of the transfer or distribution.

Attachment  
Sequence No. **128**

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

Name of transferor **AMERICAN JEWISH COMMITTEE** Identifying number (see instructions) **13-5563393**

1 If the transferor was a corporation, complete questions 1a through 1d.

- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 or fewer domestic corporations?  Yes  No N/A
- b Did the transferor remain in existence after the transfer?  Yes  No

If not, list the controlling shareholder(s) and their identifying number(s):

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

- d Have basis adjustments under section 367(a)(5) been made?  Yes  No N/A

2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 2a through 2d.

a List the name and EIN of the transferor's partnership:

Name of partnership	EIN of partnership

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

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

3 Name of transferee (foreign corporation) **SENATOR GLOBAL OPPORTUNITY OFFSHORE FUND II LTD.** 4a Identifying number, if any N/A

5 Address (including country) **C/O CITCO (CANADA) INC,  
2 BLOOR STREET EAST, STE. 2700, TORONTO, ONTARIO M4W 1A8, CANADA** 4b Reference ID number (see instructions) **AJCSGII**

6 Country code of country of incorporation or organization (see instructions) **CA**

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

8 Is the transferee foreign corporation a controlled foreign corporation? **NOT DISCLOSED**  Yes  No

For Paperwork Reduction Act Notice, see separate instructions.

**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
Cash	3/31/2014		500,000		
Stock and securities					
Installment obligations, account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b))					
Tangible property used in trade or business not listed under another category					
Intangible property					
Property to be leased (as described in final and temp. Regs. sec. 1.367(a)-4(c))					
Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d))					
Transfers of oil and gas working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e))					
Other property					

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

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

**9** Enter the transferor's interest in the foreign transferee corporation before and after the transfer:

(a) Before 0.031 % (b) After 0.09 %

**10** Type of nonrecognition transaction (see instructions) ▶ IRC SEC. 351; CASH WAS THE ONLY PROPERTY TRANSFERRED

**11** Indicate whether any transfer reported in Part III is subject to any of the following:

- a Gain recognition under section 904(f)(3)  Yes  No
- b Gain recognition under section 904(f)(5)(F)  Yes  No
- c Recapture under section 1503(d)  Yes  No
- d Exchange gain under section 987  Yes  No

**12** Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?  Yes  No

**13** 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:

- a Tainted property  Yes  No
- b Depreciation recapture  Yes  No
- c Branch loss recapture  Yes  No
- d Any other income recognition provision contained in the above-referenced regulations  Yes  No

**14** Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?  Yes  No

**15a** Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?  Yes  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?  Yes  No

**17a** Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?  Yes  No

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

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



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

Department of the Treasury  
Internal Revenue Service

▶ **Information about Form 926 and its separate instructions is at [www.irs.gov/form926](http://www.irs.gov/form926).**  
▶ **Attach to your income tax return for the year of the transfer or distribution.**

Attachment  
Sequence No. **128**

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

Name of transferor <b>AMERICAN JEWISH COMMITTEE</b>	Identifying number (see instructions) <b>13-5563393</b>
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**1** If the transferor was a corporation, complete questions 1a through 1d.

- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 or fewer domestic corporations?  Yes  No
- b** Did the transferor remain in existence after the transfer?  Yes  No

If not, list the controlling shareholder(s) and their identifying number(s):

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

- d** Have basis adjustments under section 367(a)(5) been made?  Yes  No

**2** If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 2a through 2d.

**a** List the name and EIN of the transferor's partnership:

Name of partnership	EIN of partnership
<b>CENTERBRIDGE CREDIT PARTNERS TE, LP</b>	<b>80-0521543</b>

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

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

<b>3</b> Name of transferee (foreign corporation) <b>PARK LUXCO 2 S.A.R.L.</b>	<b>4a</b> Identifying number, if any <b>98-1205405</b>
<b>5</b> Address (including country) <b>25C, BOULEVARD ROYAL, L-2449, LUXEMBOURG</b>	<b>4b</b> Reference ID number (see instructions)

**6** Country code of country of incorporation or organization (see instructions)  
**LU**

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

**8** Is the transferee foreign corporation a controlled foreign corporation?  Yes  No

**For Paperwork Reduction Act Notice, see separate instructions.**

**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
Cash					
Stock and securities					
Installment obligations, account receivables or similar property					
Foreign currency or other property denominated in foreign currency					
Inventory					
Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b))					
Tangible property used in trade or business not listed under another category					
Intangible property					
Property to be leased (as described in final and temp. Regs. sec. 1.367(a)-4(c))					
Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d))					
Transfers of oil and gas working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e))					
Other property	12/12/2014	PROPERTY	11,648	13,510	

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

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

**9** Enter the transferor's interest in the foreign transferee corporation before and after the transfer:

(a) Before 0.0000 % (b) After 0.0052 %

**10** Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351 -----

**11** Indicate whether any transfer reported in Part III is subject to any of the following:

- a Gain recognition under section 904(f)(3) . . . . .  Yes  No
- b Gain recognition under section 904(f)(5)(F) . . . . .  Yes  No
- c Recapture under section 1503(d) . . . . .  Yes  No
- d Exchange gain under section 987 . . . . .  Yes  No

**12** Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?  Yes  No

**13** 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:

- a Tainted property . . . . .  Yes  No
- b Depreciation recapture . . . . .  Yes  No
- c Branch loss recapture . . . . .  Yes  No
- d Any other income recognition provision contained in the above-referenced regulations . . . . .  Yes  No

**14** Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?  Yes  No

**15a** Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?  Yes  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? . . . . .  Yes  No

**17a** Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction? . . . . .  Yes  No

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

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_