Form <b>990-T</b>	6	Exempt Organization Business Income Tax Return (and proxy tax under section 6033(e))	rn	OMB No. 1545-0047
	For ca	lendar year 2022 or other tax year beginning, and ending		<b>2022</b>
Department of the Treasu Internal Revenue Service	ury	Go to www.irs.gov/Form990T for instructions and the latest information.  Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3	).	Open to Public Inspection for 501(c)(3) Organizations Only
A Check box if address char		Name of organization ( Check box if name changed and see instructions.)	DEmplo	yer identification number
<b>B</b> Exempt under sec	ction Print	Maine Community Foundation, Inc.	0	1-0391479
X 501( <b>c</b> )(3	or Type	Number, street, and room or suite no. If a P.O. box, see instructions.  245 Main Street	EGroup (see in	exemption number istructions)
	30(a) 29A	City or town, state or province, country, and ZIP or foreign postal code Ellsworth, ME 04605	F	Check box if
( ,		ok value of all assets at end of year		an amended return.
G Check organiza		X 501(c) corporation 501(c) trust 401(a) trust Other trust	State	college/university
H Check if filing of		Claim credit from Form 8941 Claim a refund shown on Form 2439		<u> </u>
		zation filing a consolidated return with a 501(c)(2) titleholding corporation		
_	. , , , ,	ed Schedules A (Form 990-T)		1
K During the tax	year, was th	e corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group?		Yes X No
If "Yes," enter	the name an	d identifying number of the parent corporation.		
L The books are		Michele Camarco Telephone number	(207	) 667-9735
Part I Total	Unrelate	d Business Taxable Income		
1 Total of unre	lated busine	ss taxable income computed from all unrelated trades or businesses (see		
instructions)			. 1	649,760.
2 Reserved			. 2	
3 Add lines 1 a			. 3	649,760.
		(see instructions for limitation rules) Stmt 1 Stmt 2	. 4	64,876.
		taxable income before net operating losses. Subtract line 4 from line 3	. 5	584,884.
	•	ing loss. See instructions	. 6	
7 Total of unre	lated busine	ss taxable income before specific deduction and section 199A deduction.		F04 554
Subtract line			. 7	584,884.
		rally \$1,000, but see instructions for exceptions)	. 8	1,000.
9 Trusts. Sect	tion 199A de	duction. See instructions	. 9	1 222
10 Total deduc			. 10	1,000.
11 Unrelated b	usiness tax	able income. Subtract line 10 from line 7. If line 10 is greater than line 7,		E02 004
enter zero			. 11	583,884.
Part II Tax (				100 (16
		s corporations. Multiply Part I, line 11 by 21% (0.21)	1	122,616.
		rates. See instructions for tax computation. Income tax on the amount on		
Part I, line 11		Tax rate schedule or Schedule D (Form 1041)		
3 Proxy tax. S			. 3	
4 Other tax am			4	
5 Alternative m		* **	. 5	
		cility income. See instructions	. 6	100 (16
7 Total Add lin	nes 3 throug	h 6 to line 1 or 2 whichever applies	7	122.616.

Form **990-T** (2022)

LHA For Paperwork Reduction Act Notice, see instructions.

1a b c	Foreign tax credit (corporations attach Form 1118; trusts attach Form 1116)								
	r oreign tax credit (corporations attach Form 1116, trusts attach Form 1116)		1a						
c	Other credits (see instructions)		1b						
•	General business credit. Attach Form 3800 (see instructions)		1c						
d	Credit for prior year minimum tax (attach Form 8801 or 8827)		1d						
е	Total credits. Add lines 1a through 1d					1e			
2	Subtract line 1e from Part II, line 7					2	1	22,	616
3	Other amounts due. Check if from: Form 4255 Form 8611 Other (attach statement)	orm 86	97 L	Form	8866	3			
4	Total tax. Add lines 2 and 3 (see instructions). Check if includes tax	•	•	erred unde	er		1	22	C1 C
5	section 1294. Enter tax amount here					4		22,	
	Current net 965 tax liability paid from Form 965-A, Part II, column (k)				,229.	5	·		0
	Payments: A 2021 overpayment credited to 2022 2022 estimated tax payments. Check if section 643(g) election applies		6a	110	, 449.				
C			6b 6c	160	,000.				
d	Tax deposited with Form 8868  Foreign organizations: Tax paid or withheld at source (see instructions)		6d	100	,000.				
e	Backup withholding (see instructions)		6e						
f	Credit for small employer health insurance premiums (attach Form 8941)		6f						
g	Other credits, adjustments, and payments: Form 2439	·····	<u> </u>						
		Total	6g						
7	Total payments. Add lines 6a through 6g					7	2	76,2	229
	Estimated toy populty (see instructions). Check if Forms 0000 is attacked				X				
	Estimated tax penalty (see instructions). Check if Form 2220 is attached				المكا	8			
9	Estimated tax penalty (see instructions). Check if Form 2220 is attached					9			
9 0	<b>Tax due.</b> If line 7 is smaller than the total of lines 4, 5, and 8, enter amount owed <b>Overpayment.</b> If line 7 is larger than the total of lines 4, 5, and 8, enter amount of	l overpaid	d				1.	53,6	513
9 0 1	<b>Tax due.</b> If line 7 is smaller than the total of lines 4, 5, and 8, enter amount owed <b>Overpayment.</b> If line 7 is larger than the total of lines 4, 5, and 8, enter amount of Enter the amount of line 10 you want: <b>Credited to 2023 estimated tax</b>	verpaid	d 3,61	3. Re	efunded	9	1	53,6	
0 <u>1</u> <b>art</b> 1	Tax due. If line 7 is smaller than the total of lines 4, 5, and 8, enter amount owed Overpayment. If line 7 is larger than the total of lines 4, 5, and 8, enter amount of Enter the amount of line 10 you want: Credited to 2023 estimated tax  IV Statements Regarding Certain Activities and Other Information At any time during the 2022 calendar year, did the organization have an interest over a financial account (bank, securities, or other) in a foreign country? If "Yes,"	verpaid 15: matio in or a	d 3 , 61 on (see i signatui ganizati	3 • Renstruction re or other on may ha	efunded s) authority ve to file	9	1.	53,6 Yes	0
9 0 <u>1</u> <b>art</b> 1	Tax due. If line 7 is smaller than the total of lines 4, 5, and 8, enter amount owed Overpayment. If line 7 is larger than the total of lines 4, 5, and 8, enter amount of Enter the amount of line 10 you want: Credited to 2023 estimated tax   V   Statements Regarding Certain Activities and Other Inform At any time during the 2022 calendar year, did the organization have an interest over a financial account (bank, securities, or other) in a foreign country? If "Yes," enter here  During the tax year, did the organization receive a distribution from, or was it the	overpaid  15.  matio in or a the order the n  granto	d 3,61 (see in signature ganization ame of the orthogon)	3 • Renstruction re or other on may hathe foreign	efunded s) authority ve to file n country	9 10 11		T	0 No
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223711 01-16-23

**Use Only** 

Form **990-T** (2022)

Phone no. (207)879-2100

Portland, ME 04112

P.O. Box 507

Firm's address

Form 990-T	Contributions	Statement	1
Description/Kind of Property	Method Used to Determine FMV	Amount	
Charitable contributions to qualifying 170(c)	N/A		
organizations		51,315,9	47.
Total to Form 990-T, Part I, 1	ine 4	51,315,9	47.

Form 990-T Co	ontributions Summary		Statement	2
Qualified Contributions Subj Qualified Contributions Subj				
Carryover of Prior Years Unu For Tax Year 2017 For Tax Year 2018 For Tax Year 2019 For Tax Year 2020 For Tax Year 2021	30,811,952 32,321,100 40,374,379 39,534,842			
Total Carryover Total Current Year 10% Contr	ributions	143,042,273 51,315,947		
Total Contributions Availabl Taxable Income Limitation as		194,358,220 64,876		
Excess Contributions Excess 100% Contributions Total Excess Contributions	_	194,293,344 0 194,293,344		
Allowable Contributions Dedu	uction -		64,8	876
Total Contribution Deduction	1		64,8	876

### SCHEDULE A (Form 990-T)

## **Unrelated Business Taxable Income From an Unrelated Trade or Business**

OMB No. 1545-0047

2022

Department of the Treasury Internal Revenue Service Go to www.irs.gov/Form990T for instructions and the latest information.

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

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

A 1	lame of the organization  Maine Community Foundation, Inc.		yer identification number 0391479				
<u>c</u> .	Unrelated business activity code (see instructions) 52000	0		<b>D</b> Sequence	e: 1	of	1
<b>E</b> [	Describe the unrelated trade or business Section 512(	a)(	6) Qualified	Partners	hips		
Pa	t I Unrelated Trade or Business Income		(A) Income	(B) Expense	s	(C) N	et
1 a	Gross receipts or sales						
b	Less returns and allowances c Balance	1c					
2	Cost of goods sold (Part III, line 8)	2					
3	Gross profit. Subtract line 2 from line 1c	3					
4 a	Capital gain net income (attach Schedule D (Form 1041 or Form						
	1120)). See instructions	4a					
b	Net gain (loss) (Form 4797) (attach Form 4797). See instructions)	4b					
С	Capital loss deduction for trusts	4c					
5	Income (loss) from a partnership or an S corporation (attach						
	statement) Statement 3	5	737,921.			737	<u>,921.</u>
6	Rent income (Part IV)	6					
7	Unrelated debt-financed income (Part V)	7					
8	Interest, annuities, royalties, and rents from a controlled						
	organization (Part VI)	8					
9	Investment income of section 501(c)(7), (9), or (17)						
	organizations (Part VII)	9					
10	Exploited exempt activity income (Part VIII)	10					
11	Advertising income (Part IX)	11					
12	Other income (see instructions; attach statement)	12	505.004				
<u>13</u>	Total. Combine lines 3 through 12	13	737,921.			737	,921.
Pa	Deductions Not Taken Elsewhere See instruction directly connected with the unrelated business in			ductions. Ded	uctions	must be	
1	Compensation of officers, directors, and trustees (Part X)				1		
2	Salaries and wages				2		
3	Repairs and maintenance				3		
4	Bad debts				4		
5	Interest (attach statement). See instructions				5		
6	Taxes and licenses				6	47	,352.
7	Depreciation (attach Form 4562). See instructions		7				
8	Less depreciation claimed in Part III and elsewhere on return		8a		8b		
9	Depletion				9		
10	Contributions to deferred compensation plans				10		
11	Employee benefit programs				11		
12	Excess exempt expenses (Part VIII)				12		
13	Excess readership costs (Part IX)				13		
14	Other deductions (attach statement)				14		252
15					15	47	,352.
16	Unrelated business income before net operating loss deduction. S						F.C.0
	column (C)				16		<u>,569.</u>
17	Deduction for net operating loss. See instructions				17		,809.
<u>18</u>	Unrelated business taxable income. Subtract line 17 from line 10	6			18		,760.
LHA	For Paperwork Reduction Act Notice, see instructions.			S	chedule	A (Form 99	0-T) 2022

	ule A (Form 990-1) 2022						Page 2
Part		nod of inventory valua					
1	Inventory at beginning of year				1		
2	Purchases				2		
3	Cost of labor				3		
4	Additional section 263A costs (attach statement)				4		
5	Other costs (attach statement)				5		
6	Total. Add lines 1 through 5				6		
7	Inventory at end of year		_		7		
8	Cost of goods sold. Subtract line 7 from line 6. Enter				8	Yes	No
9 Part	Do the rules of section 263A (with respect to property IV Rent Income (From Real Property and					1es _	
1	Description of property (property street address, city, s				<u>y)</u>		
•	A	state, ZIP Code). Grie	JK II a dual-use. See IIIs	tructions.			
	В						
	c $\square$						
	D						
	<u> </u>	Α	В	С		D	
2	Rent received or accrued	^	<u> </u>				
a	From personal property (if the percentage of						
а	rent for personal property is more than 10%						
	but not more than 50%)						
b	From real and personal property (if the						
b	percentage of rent for personal property exceeds						
	50% or if the rent is based on profit or income)						
С	Total rents received or accrued by property.						
C	Add lines 2a and 2b, columns A through D						
3	Total rents received or accrued. Add line 2c columns A Deductions directly connected with the income	through D. Enter he	Te and on Part 1, line 6,	Column (A)			0.
4	in lines 2(a) and 2(b) (attach statement)						
5	Total deductions. Add line 4 columns A through D. Er		I, line 6, column (B)				0.
Part '	V Unrelated Debt-Financed Income (se	ee instructions)					
1	Description of debt-financed property (street address,	city, state, ZIP code)	Check if a dual-use. So	ee instructions.			
	A						
	В						
	c						
	D			_			
		A	В	С		D	
2	Gross income from or allocable to debt-financed						
_	property						
3	Deductions directly connected with or allocable						
	to debt-financed property						
a	Straight line depreciation (attach statement)						
b	Other deductions (attach statement)						
С	Total deductions (add lines 3a and 3b,						
	columns A through D)						
4	Amount of average acquisition debt on or allocable						
_	to debt-financed property (attach statement)						
5	Average adjusted basis of or allocable to debt-						
_	financed property (attach statement)						
6	Divide line 4 by line 5	9	6 %		%		%
7	Gross income reportable. Multiply line 2 by line 6		<u> </u>				0.
8	Total gross income (add line 7, columns A through D)	. Enter here and on P	art I, line 7, column (A)				0.
_	Allegately deducation At W. L. W. Co. C. W. C.		T				
		ough D. Cetaultau	nd on Doubling 7 - 1	 			0.
10	Total dividends-received deductions included in line						0.
9 10	Allocable deductions. Multiply line 3c by line 6  Total allocable deductions. Add line 9, columns A thr						

Part	art VI Interest, Annuities, Royalties, and Rents from Controlled Organizations (see instructions)							J			
	Exempt Controlled Organization					ganization	ıs				
	1. Name of controlled	d	2. Employer	3. Net	unrelated	4. Tota	al of specified		rt of colur		6. Deductions directly
	organization		identification		ne (loss)	payn	nents made		included olling orga		connected with
			number	(see ins	structions)			tion's gross in			income in column 5
(1)											
(2)											
(3)											
(4)											
					Controlled O	-	i				
7	. Taxable Income		Net unrelated		otal of specif		10. Part of column 9 that is included in the			11. Deductions directly	
			ncome (loss)	pa	yments mad	е	controlling				connected with
		(Sei	e instructions)				gross	income	е	Inc	ome in column 10
(1)											
(2)											
(3)											
(4)							<b>.</b>		1.40		
							Add colum Enter here			Add columns 6 and 11.  Enter here and on Part I,	
							line 8, c				ne 8, column (B)
Totals									0.		0.
Part	VII Investment	Income	of a Section 50	11(c)(7)	(9) or (17	Orga	nization (s	oo inetr			•
		ription of		,,(0)(1),	2. Amou		3. Deduction		<b>4.</b> Set-	asides	5. Total deductions
					incon		directly conn	ected	(attach st		t) and set-asides
							(attach state	ment)			(add cols 3 and 4)
(1)											
(2)											
(3)											
(4)											
					Add amou						Add amounts in
					column 2.						column 5. Enter here and on Part I,
					line 9, colu						line 9, column (B)
Totals						0.					0.
Part	VIII Exploited E	xempt A	Activity Income	, Other	Than Adv	ertisir	ng Income	see ins	tructions)		
1	Description of exploite	-									
2	Gross unrelated busin	ess incom	ne from trade or bus	iness. Ente	er here and o	n Part I	, line 10, colum	nn (A) .		2	
3	Expenses directly con	nected wi	th production of unr	elated bus	siness incom	e. Enter	here and on F	Part I,			
	line 10, column (B)									3	
4	Net income (loss) from						-				
	lines 5 through 7									4	
5	Gross income from ac									5	
6	Expenses attributable									6	
7	Excess exempt expen			5, but do n	ot enter moi	e than t	he amount on	line		_	
	4. Enter here and on F	art II, line	12							7	

Schedule A (Form 990-T) 2022

Part	IX Advertising Income					
1	Name(s) of periodical(s). Check box if repor	ting two or	more periodicals on a	consolidated bas	sis.	
	A 🔲					
	В					
	c 🗆					
	D					
Enter a	amounts for each periodical listed above in the	ne correspo	nding column.			
	•		A	В	С	D
2	Gross advertising income					_
_	Add columns A through D. Enter here and o		e 11 column (A)	l.		0.
а	, ida obiamino / tambagii B. Enter noro ana t	5111 G. C. 1, III.				
3	Direct advertising costs by periodical					
а	Add columns A through D. Enter here and o		e 11. column (B)			0.
-	Add coldmile At through B. Enter Here and t	5111 GIC 1, III1	(B)			
4	Advertising gain (loss). Subtract line 3 from	line				
•	2. For any column in line 4 showing a gain,					
	complete lines 5 through 8. For any column	ı in				
	line 4 showing a loss or zero, do not complete					
	lines 5 through 7, and enter zero on line 8					
5						
6	Readership costs					
7	Circulation income  Excess readership costs. If line 6 is less that					
'	•					
	line 5, subtract line 6 from line 5. If line 5 is					
8	than line 6, enter zero					
0	•	2.00				
	deduction. For each column showing a gair line 4, enter the lesser of line 4 or line 7					
_			ha lina Qa aalumna ta	tal ar zara bara a	nd on	
а	Add line 8, columns A through D. Enter the	-				0.
Part	Part II, line 13  X Compensation of Officers, I	irectors	and Trustees (s	ee instructions)		
· uit	X Componential of Cinecia, 2		, and madeous (3	cc manachoria)	3. Percentage	4. Compensation
	<b>1.</b> Name		2. Title		of time devoted	attributable to
	· Name		Zi Tido		to business	unrelated business
(1)					%	difference buoiness
(2)					%	
(3)					%	
(4)		+			%	
(+)					70	
Total	I. Enter here and on Part II, line 1					0.
Part	, , , , , , , , , , , , , , , , , , , ,	eoo inetruct				
ı art	Supplemental information (	see msnuci	.10115)			

Form 990-T (A) Income (Loss) from Partnerships	Statement 3
Description	Net Income or (Loss)
Abrams Capital Partners I - Ordinary Business Income (loss) Accolade Partners V, LP - Ordinary Business Income (loss) Accolade Partners VI, LP - Ordinary Business Income (loss) Accolade Partners VI, LP - Ordinary Business Income (loss) Commonfund Capital Natural Resource Partners VI - Ordinary Business Income ( Commonfund Capital Natural Resource Partners VII - Ordinary Business Income Commonfund Capital Natural Resource Partners VIII - Ordinary Business Income Commonfund Capital Natural Resource Partners IX - Ordinary Business Income ( Commonfund Capital Natural Resource Partners X - Ordinary Business Income (losmonfund Capital Venture Partners VI, LP - Ordinary Business Income (loss) Commonfund Capital Venture Partners VII, LP - Ordinary Business Income (loss Commonfund Capital Venture Partners VIII, LP - Ordinary Business Income (loss Commonfund Capital Venture Partners IX, LP - Ordinary Business Income (loss) Commonfund Capital Venture Partners X, LP - Ordinary Business Income (loss) Commonfund Capital Venture Partners XI, LP - Ordinary Business Income (loss) Commonfund Capital Venture Partners XI, LP - Ordinary Business Income (loss) Commonfund Capital Venture Partners XI, LP - Ordinary Business Income (loss) Legacy Venture IV, LLC - Ordinary Business Income (loss) Legacy Venture VIII, LLC - Ordinary Business Income (loss)	
Metropolitan Real Estate Partners 2008 Distressed Credit Co-Inve - Ordinary Metropolitan Real Estate Partners V, LP - Ordinary Business Income (loss)	-56.
Metropolitan Real Estate Partners VI, LP - Ordinary Business Income (loss) Metropolitan Real Estate Partners VII, LP - Ordinary Business Income (loss) Metropolitan Real Estate Partners VIII LP - Ordinary	232. 2,990.
Metropolitan Real Estate Partners VIII, LP - Ordinary Business Income (loss) Metropolitan Real Estate Partners IX, LP - Ordinary Business Income (loss) Park Street Capital Natural Resource Fund III, LP -	-753. -189.
Ordinary Business Income Park Street Capital Natural Resource Fund IV, LP - Ordinary Business Income Park Street Capital Natural Resource Fund V, LP - Ordinary Business Income (	-187. 80. 36,039.

Maine Community Foundation, Inc.	01-0391479
Park Street Capital Natural Resource Fund VI, LP -	
Ordinary Business Income	-23,850.
Riva Capital Partners III, LP - Ordinary Business Income	23,0301
(loss)	-2,425.
Riva Capital Partners IV, LP - Ordinary Business Income	2,1231
(loss)	225,360.
Superior Mineral Resources LLC - Ordinary Business Income	223,3001
(loss)	-2.
Thirteen Partners Private Equity 4, LP - Ordinary Business	2.
Income (loss)	142,669.
Accolade Partners VII, LP - Ordinary Business Income	112,005.
(loss)	-1,407.
Accolade Partners Growth I, L.P Ordinary Business	1,407.
Income (loss)	-21,987.
Moonrise Venture Partners I LP - Ordinary Business Income	-21,907.
(loss)	3,438.
·	3,430.
Riva Capital Partners V, LP - Ordinary Business Income	EO 710
(loss)	-50,710.
Accolade Partners VIII, LP - Ordinary Business Income	1 150
(loss)	-1,150.
Accolade Partners Blockchain I, LP - Ordinary Business	210
Income (loss)	-318.
Thirteen Partners Private Equity 6, LP - Ordinary Business	105 005
Income (loss)	197,907.
Accolade Partners VI-C, LP - Ordinary Business Income	
(loss)	277.
Accolade Partners B, LP - Ordinary Business Income (loss)	34,429.
Accolade Partners D, LP - Ordinary Business Income (loss)	-13,985.
Accolade Partners Blockchain II, LP - Ordinary Business	
Income (loss)	-34,779.
Accolade Partners Blockchain II-A, LP - Ordinary Business	
Income (loss)	5,516.
Accolade Partners Growth II, LP - Ordinary Business Income	
(loss)	-3,051.
Legacy Venture VII, LLC - Ordinary Business Income (loss)	122.
Legacy Venture IX, LLC - Ordinary Business Income (loss)	831.
Legacy Venture X, LLC - Ordinary Business Income (loss)	563.
Moonrise China Partners I, LP - Ordinary Business Income	
(loss)	20.
Moonrise Venture Partners II, LP - Ordinary Business	
Income (loss)	709.
Moonrise Venture Partners III, LP - Ordinary Business	
Income (loss)	527.
Accolade Partnerse IX, LP - Ordinary Business Income	32,1
(loss)	-9,240.
Riva Capital Partners VI, LP - Ordinary Business Income	J, 240.
(loss)	-11,109.
Thirteen Partners Private Equity 8, LP - Ordinary Business	11,100.
Income (loss)	-3,996.
IIICOMC (IOSS)	-J, JJU •
Total Included on Schedule A, Part I, line 5	737,921.
Total Included on beheatle A, late 1, line 3	131,341.

NOL Carryover Available This Year

40,809.

Form 990-T	(A)	F	Post 2017 NOL Sc	hedule	Statement	4
Prior Year 2017 NO			NOL Deduction	Carryfo Post 20	rward of 17 NOL	
4(	0,809.		40,809.		0.	
990-T Sch 2	<u> </u>	Post-201	.7 Net Operating	Loss Deduction	Statement	<del></del> 5
			Loss Previously	Loss	Available	
Tax Year	Loss	Sustained	Applied	Remaining	This Year	

40,809.

Sch A (990-T)	Schedule A NOL Detail	Statement 6
Taxable income fr This entities por	com all entities tion of taxable income	690,569. 690,569.
	centage of pre-2018 net operating loss owed pre-2018 net operating loss	100.00%
Taxable income af 80% income limita	ter pre-2018 net operating loss	690,569. 552,455.
Post-2017 availak Lesser of Post-20	ole 17 net operating loss or 80% limitation	40,809. 40,809.

## Form **2220**Department of the Treasury

### **Underpayment of Estimated Tax by Corporations**

Attach to the corporation's tax return. Form 990-T

1 990-T **20**2

Internal Revenue Service Go to www.irs.gov/Form2220 for instructions and the latest information.

Maine Community Foundation, Inc.

OMB No. 1545-0123

Name

Employer identification number 01-0391479

**Note:** Generally, the corporation is not required to file Form 2220 (see Part II below for exceptions) because the IRS will figure any penalty owed and bill the corporation. However, the corporation may still use Form 2220 to figure the penalty. If so, enter the amount from page 2, line 38, on the estimated tax penalty line of the corporation's income tax return, but **do not** attach Form 2220.

estimated tax penalty line of the corporation's income tax	retur	n, but <b>do not</b> attach F	orm 2220.				
Part I Required Annual Payment						, ,	
1 Total tax (see instructions)						1	122,616.
2 a Personal holding company tax (Schedule PH (Form 1120), line 26) included on line 1							
<b>b</b> Look-back interest included on line 1 under section 460(b)(2) for completed long-term							
contracts or section 167(g) for depreciation under the income forecast method							
<b>c</b> Credit for federal tax paid on fuels (see instructions)							
d Total. Add lines 2a through 2c						2d	
3 Subtract line 2d from line 1. If the result is less than \$500, do	not c	omplete or file this form.	The corporation				100 616
does not owe the penalty						3	122,616.
4 Enter the tax shown on the corporation's 2021 income tax re							10 420
or the tax year was for less than 12 months, skip this line and	d enter	the amount from line 3	on line 5			4	12,439.
5 Required annual payment. Enter the smaller of line 3 or line						_	12,439.
enter the amount from line 3  Part II   Reasons for Filing - Check the boxes bel						5	12,439.
even if it does not owe a penalty. See instructions.	UW III	ii appiy. Ii aliy buxes are	checkeu, the co	poration	illust lile Fortit Za	220	
6 The corporation is using the adjusted seasonal instal	lmant	method					
7 X The corporation is using the annualized income insta							
8 The corporation is a "large corporation" figuring its fir			on the prior year	e tav			
Part III   Figuring the Underpayment	streq	ulled ilistallillellt baseu t	ni tile prior year	s lan.			
The state of the s		(a)	(b)		(c)		(d)
9 Installment due dates. Enter in columns (a) through (d) the	$\Box$	(=)	(-)		(6)		(-)
15th day of the 4th ( <b>Form 990-PF filers</b> : Use 5th month),							
6th, 9th, and 12th months of the corporation's tax year	9	04/15/22	06/15	/22	09/15/	22	12/15/22
10 Required installments. If the box on line 6 and/or line 7				•			
above is checked, enter the amounts from Sch A, line 38. If							
the box on line 8 (but not 6 or 7) is checked, see instructions							
for the amounts to enter. If none of these boxes are checked,	1 1						
enter 25% (0.25) of line 5 above in each column	10						
11 Estimated tax paid or credited for each period. For	H						
column (a) only, enter the amount from line 11 on line 15.							
See instructions	11	116,229.					
Complete lines 12 through 18 of one column							
before going to the next column.							
12 Enter amount, if any, from line 18 of the preceding column	12		116,		116,2		116,229.
<b>13</b> Add lines 11 and 12	13		116,	229.	116,2	29.	116,229.
14 Add amounts on lines 16 and 17 of the preceding column	14						
15 Subtract line 14 from line 13. If zero or less, enter -0-	15	116,229.	116,	229.	116,2	29.	116,229.
16 If the amount on line 15 is zero, subtract line 13 from line							
14. Otherwise, enter -0-	16						
17 Underpayment. If line 15 is less than or equal to line 10,							
subtract line 15 from line 10. Then go to line 12 of the next							
column. Otherwise, go to line 18	17						
<b>18 Overpayment</b> . If line 10 is less than line 15, subtract line 10		116 000	116	000	1	, ,	
from line 15. Then go to line 12 of the next column	18	116,229.	116,		116,2	29.	
Go to Part IV on page 2 to figure the penalty. Do not go to Part	V if th	ere are no entries on lir	ie 17 - no penal	ty is owe	d.		

LHA For Paperwork Reduction Act Notice, see separate instructions.

Form 2220 (2022)

Form 2220 (2022)

### Part IV Figuring the Penalty

			(a)	(b)	(c)	(d)	
19	Enter the date of payment or the 15th day of the 4th month after the close of the tax year, whichever is earlier.  (C corporations with tax years ending June 30 and S corporations: Use 3rd month instead of 4th month.  Form 990-PF and Form 990-T filers: Use 5th month instead of 4th month.) See instructions	19					
20	Number of days from due date of installment on line 9 to the						
	date shown on line 19	20					
21	Number of days on line 20 after 4/15/2022 and before 7/1/2022	21					
22	Underpayment on line 17 x Number of days on line 21 x 4% (0.04)	22	\$	\$	\$	\$	
23	Number of days on line 20 after 6/30/2022 and before 10/1/2022	23					
24	Underpayment on line 17 x Number of days on line 23 x 5% (0.05)	24	\$	\$	\$	\$	
25	Number of days on line 20 after 9/30/2022 and before 1/1/2023	25					
26	Underpayment on line 17 x Number of days on line 25 x 6% (0.06)	26	\$	\$	\$	\$	
27	Number of days on line 20 after 12/31/2022 and before 4/1/2023	27					
28	Underpayment on line 17 x Number of days on line 27 x 7% (0.07) 365	28	\$	\$	\$	\$	
29	Number of days on line 20 after 3/31/2023 and before 7/1/2023	29					
30	Underpayment on line 17 x Number of days on line 29 x *%	30	\$	\$	\$	\$	
31	Number of days on line 20 after 6/30/2023 and before 10/1/2023	31					
32	Underpayment on line 17 x Number of days on line 31 x *%	32	\$	\$	\$	\$	
33	Number of days on line 20 after 9/30/2023 and before 1/1/2024	33					
34	Underpayment on line 17 x Number of days on line 33 x *%	34	\$	\$	\$	\$	
35	Number of days on line 20 after 12/31/2023 and before 3/16/2024	35					
36	Underpayment on line 17 x Number of days on line 35 x *%	36	\$	\$	\$	\$	
37	Add lines 22, 24, 26, 28, 30, 32, 34, and 36	37	\$	\$	\$	\$	
38	<b>Penalty.</b> Add columns (a) through (d) of line 37. Enter the to line for other income tax returns				able	38 \$	0.

<sup>\*</sup> Use the penalty interest rate for each calendar quarter, which the IRS will determine during the first month in the preceding quarter. These rates are published quarterly in an IRS News Release and in a revenue ruling in the Internal Revenue Bulletin. To obtain this information on the Internet, access the IRS website at www.irs.gov. You can also call 1-800-829-4933 to get interest rate information.

Form **2220** (2022)

Form 990-T

Page 3

### Schedule A Adjusted Seasonal Installment Method and Annualized Income Installment Method See instructions.

Form 1120-S filers: For lines 1, 2, 3, and 21, "taxable income" refers to excess net passive income or the amount on which tax is imposed under section 1374(a), whichever applies.

### **Adjusted Seasonal Installment Method**

 $\textbf{Caution:} \ \, \textbf{Use this method only if the base period percentage for any 6 consecutive months is at least 70\%.}$ See instructions.

		(a)	(b)	(c)	(d)
1 Enter taxable income for the following periods.		First 3 months	First 5 months	First 8 months	First 11 months
<b>a</b> Tax year beginning in 2019	1a	Thor o months	Thor o months	Thor o months	Thoc II mondio
<b>b</b> Tax year beginning in 2020	1b				
b rax your boginning in 2020	"				
c Tax year beginning in 2021	1c				
2 Enter taxable income for each period for the tax year beginning in					
2022. See the instructions for the treatment of extraordinary items	2				
		First 4 months	First 6 months	First 9 months	Entire year
3 Enter taxable income for the following periods.		That 4 months	That o months	1 1131 3 111011113	Entire year
<b>a</b> Tax year beginning in 2019	3a				
<b>b</b> Tax year beginning in 2020	3b				
c Tax year beginning in 2021	3c				
4 Divide the amount in each column on line 1a by the					
amount in column (d) on line 3a	4				
5 Divide the amount in each column on line 1b by the					
amount in column (d) on line 3b	5				
6 Divide the amount in each column on line 1c by the					
amount in column (d) on line 3c	6				
7 Add lines 4 through 6	7				
• P: :					
8 Divide line 7 by 3.0	8				
9a Divide line 2 by line 8	9a				
<b>b</b> Extraordinary items (see instructions)	9b				
c Add lines 9a and 9b	9c				
10 Figure the tax on the amt on In 9c using the instr for Form	,,				
1120, Sch J, line 2, or comparable line of corp's return	10				
11a Divide the amount in columns (a) through (c) on line 3a	,,,				
by the amount in column (d) on line 3a	11a				
<b>b</b> Divide the amount in columns (a) through (c) on line 3b	,,,				
by the amount in column (d) on line 3b	11b				
c Divide the amount in columns (a) through (c) on line 3c by the amount in column (d) on line 3c	11c				
	12				
12 Add lines 11a through 11c	13				
<ul><li>13 Divide line 12 by 3.0</li><li>14 Multiply the amount in columns (a) through (c) of line 10</li></ul>	13				
by columns (a) through (c) of line 13. In column (d), enter					
	14				
the amount from line 10, column (d)  15 Enter any alternative minimum tax (trusts only) for each	14				
payment period. See instructions	15				
16 Enter any other taxes for each payment period. See instr.	16				
17 Add lines 14 through 16	17				
<b>18</b> For each period, enter the same type of credits as allowed					
on Form 2220, lines 1 and 2c. See instructions	18				
19 Total tax after credits. Subtract line 18 from line 17. If					
zero or less, enter -0-	19				

Form 2220 (2022)

Form 2220 (2022) Form 990-T Page 4

### Part II **Annualized Income Installment Method** (d) (a) (b) (c) 10 2 First First First First 20 Annualization periods (see instructions) ..... 20 months months months months 21 Enter taxable income for each annualization period. See instructions for the treatment of extraordinary items ..... 21 6.000000 3.000000 1.714290 1.200000 **22** Annualization amounts (see instructions) 22 23a Annualized taxable income. Multiply line 21 by line 22 23a **b** Extraordinary items (see instructions) 23b 23c c Add lines 23a and 23b 24 Figure the tax on the amount on line 23c using the instructions for Form 1120, Schedule J, line 2, or comparable line of corporation's return 24 25 Enter any alternative minimum tax (trusts only) for each payment period (see instructions) 25 26 Enter any other taxes for each payment period. See instr. 26 27 Total tax. Add lines 24 through 26 27 28 For each period, enter the same type of credits as allowed on Form 2220, lines 1 and 2c. See instructions 28 29 Total tax after credits. Subtract line 28 from line 27. If zero or less, enter -0-29 50% 30 Applicable percentage 30 25% 75% 100% 31 Multiply line 29 by line 30 31 Part III Required Installments Note: Complete lines 32 through 38 of one column 2nd 3rd 4th 1st before completing the next column. installment installment installment installment 32 If only Part I or Part II is completed, enter the amount in each column from line 19 or line 31. If both parts are completed, enter the smaller of the amounts in each 0 column from line 19 or line 31 0. 0 0. 32 33 Add the amounts in all preceding columns of line 38. See instructions 33 34 Adjusted seasonal or annualized income installments. Subtract line 33 from line 32. If zero or less, enter -0-34 35 Enter 25% (0.25) of line 5 on page 1 of Form 2220 in each column. Note: "Large corporations," see the instructions for line 10 for the amounts to enter ...... 3,110. 3,110. 3,109 3,110. 35 36 Subtract line 38 of the preceding column from line 37 of 3,110. 6,220 9,329. the preceding column 36 3,110. 6,220. 9,329 12,439. **37** Add lines 35 and 36 37

Form **2220** (2022)

0.

\*\* Annualized Income Installment Method Using Option 1

38

See instructions

0

**38 Required installments.** Enter the **smaller** of line 34 or line 37 here and on page 1 of Form 2220, line 10.

# Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information. ► Attach to your income tax return for the year of the transfer or distribution.

OMB	No.	1545-0026

Attachment Sequence No. **128** 

Part I U.S. Transferor Information (see instructions)				
Name of transferor  Maine Community Foundation Inc	Id	Identifying number (see instructions		
Maine Community Foundation, Inc.		01-03914	179	
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?			X No	
2 If the transferor was a corporation, complete questions 2a through 2d.				
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by				
five or fewer domestic corporations?		Yes	X No	
b Did the transferor remain in existence after the transfer?		X Yes	□ No	
If not, list the controlling shareholder(s) and their identifying number(s).	***************************************			
Controlling shareholder	Identif	fying number		
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporat If not, list the name and employer identification number (EIN) of the parent corporation.	ion?	X Yes	No No	
Name of parent corporation	EIN of par	rent corporation	on	
d Have basis adjustments under section 367(a)(4) been made?		Yes	X No	
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un complete questions 3a through 3d.	der section	367),		
a List the name and EIN of the transferor's partnership.				
Name of partnership	EIN of	f partnership		
<b>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?  Part II Transferee Foreign Corporation Information (see instructions)		Yes	No	
	<del></del>			
4 Name of transferee (foreign corporation)	5a Idei	ntifying numbe	er, if any	
AKO European Long-Only Fund Limited				
6 Address (including country)	5b Ref	erence ID num	ber	
Ugland House, P.O. Box 309				
Grand Cayman, Cayman Islands KY1-1104 Cayman Islands	510	7.5		
7 Country code of country of incorporation or organization Cayman Islands	-			
8 Foreign law characterization (see instructions)				
Cayman Islands Exempted Company  9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No	
224531 04-01-22 LHA For Paperwork Reduction Act Notice, see separate instructions.			Rev. 11-2018	

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

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

Form 926 (Rev. 11-2018)

Form	1926 (Rev. 11-2018) Maine Community Foundation, Inc.	01-0391479	Page 3
	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?		No No
	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?	Yes	└── No
С	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section		
	1.367(d)-1(c)(3)(ii) for any intangible property?	Yes	└── No
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable		
	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in		
	Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$		
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any		
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	☐ No
	when and a Deat III before a time Demoire d.T. De Demoire d.( )		
	pplemental Part III Information Required To Be Reported (see instructions)	VO Humanaan	
	e Maine Community Foundation transferred \$5,000,000 to A		·
	ng-Only Fund Limited in its 2022 tax year in exchange fo		in the
	nd. This entity is a hedge fund based in the Cayman Isla		
	gistered with the United States SEC. The Fund invests in	various for	reign
ent	tities.		
		_	
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
	(a) Before 0.177 % (b) After 0.177 %		
17	Type of nonrecognition transaction (see instructions) ▶ Section 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)		X No
b	Gain recognition under section 904(f)(5)(F)	· · · · · · · · · · · · · · · · · · ·	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?		X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	<b>&gt;</b> \$	
c	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
•	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	☐ No
21			

Yes

Return by a U.S. Transferor of Property

to a Foreign Corporation

• Go to www.irs.gov/Form926 for instructions and the latest information

ion.	
	Attachment .
	Coguence No.

Department of the Treasury Internal Revenue Service ▶ Attach to your income tax return for the year of the transfer or distribution.

Sequence No. 128

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	Idealifica acceptor
Name of transferor  Maine Community Foundation, Inc.	Identifying number (see instructions)
maine community roundation, inc.	01-0391479
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	ration? Yes X No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368	
five or fewer domestic corporations?	Yes X No
<b>b</b> Did the transferor remain in existence after the transfer?	X 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 If not, list the name and employer identification number (EIN) of the parent corporation.	corporation? X Yes No
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(4) been made?	Yes X No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	such under section 367),
complete questions 3a through 3d.	
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
Traine of paranetering	
<b>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 <b>entire</b> interest in the partnership?	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establi	
securities market?	□ v <sub>ee</sub> □ N <sub>e</sub>
Part II Transferee Foreign Corporation Information (see instructions)	
4 Name of transferee (foreign corporation)	5a Identifying number, if any
AKO Global Fund Limited	
6 Address (including country)	5b Reference ID number
Ugland House, P.O. Box 309	
<u> Grand Cayman, Cayman Islands KY1-1104 Cayman Islands</u>	5107.6
7 Country code of country of incorporation or organization Cayman Islands	
8 Foreign law characterization (see instructions) Cayman Islands Exempted Company	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
224531 04-01-22 LHA For Panerwork Reduction Act Notice see senarate instructions	Form <b>926</b> (Rev. 11-2018)

Section C - Intendible Property Subject to Section 367(d)

If "No," skip Section C and questions 14a through 15.

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

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

Did the transferor transfer property described in section 367(d)(4)?

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

Form **926** (Rev. 11-2018)

」No

Form	1926 (Rev. 11-2018) Maine Community Foundation, Inc.	01-0391479 Page 3
b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii)   Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes No
Sup	pplemental Part III Information Required To Be Reported (see instructions)	
	e Maine Community Foundation transferred \$3,000,000 to A	KO Global Fund
	mited in its 2022 tax year in exchange for interest in the	
	tity is a hedge fund based in the Cayman Islands, and is	
the	e United States SEC. The Fund invests in various foreign	entities.
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)	
16 17	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	
18	Indicate whether any transfer reported in Part III is subject to any of the following.	<del></del>
	Gain recognition under section 904(f)(3)	Yes X No
b	Gain recognition under section 904(f)(5)(F)	
C		······
	Exchange gain under section 987	
19		
	Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	
20 a	If "Yes," complete lines 20b and 20c.	Lies Lies No
h	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	<b>•</b> \$
	Did the domestic corporation not recognize gain or loss on the distribution of property because the	• • •
٦	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes No
21		L 163 L NO

Form **926** (Rev. 11-2018)

Yes

# Form **926**(Rev. November 2018) Department of the Treasury Internal Revenue Service

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

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information.

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

OMB No. 1545-0026

Attachment Sequence No. **128** 

Name of transferor	Identifying number (see instructions)
Maine Community Foundation, Inc.	
	01-0391479
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?	Yes X No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by	
five or fewer domestic corporations?	
<b>b</b> Did the transferor remain in existence after the transfer?	X 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 corpor	ration? X Yes No
If not, list the name and employer identification number (EIN) of the parent corporation.	
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(4) been made?	Yes X No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as such that was the actual transferor (but is not treated as the act	under section 367),
complete questions 3a through 3d.	
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
<b>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)	
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Davidson Kempner LT Distressed Opp Int'1 V (AIV-TE)	
6 Address (including country) C/O Walkers Corp. Ltd. Cayman Corp. Ctr. 27 Hospital Rd	5b Reference ID number
George Town, Cayman Islands KY1-9008 Cayman Islands	5107.20
7 Country code of country of incorporation or organization	3107.20
CJ	
8 Foreign law characterization (see instructions) Limited Partnership	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
201501 01 01 01 LUA For Penerwerk Peduation Act Notice concentrate instructions	Form 026 (Pay 11 2019)

Page 2
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	Regarding Tran	sfer of Property (see i	nstructi	ions)		
Section A - Cash						
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash	12/31/2022	,		482,517.		
10 Was cash the only pro	ainder of Part III and					X Yes No
	<del></del>	an intangible property	subjec			1 (a)
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory			1			
Other property (not listed under another category)						
			+			
Property with			+			_
built-in loss			+			
 Totals						
<ul> <li>12 a Were any assets of a foreign corporation? If "Yes," go to line 12b b Was the transferor a definition (including a branch that If "Yes," continue to line transferee foreign corporate if "Yes," continue to line definition. </li> </ul>	foreign branch (included)  domestic corporation at is a foreign disregation at 12c. If "No," skip transfer, was the dorporation?  ne 12d. If "No," skip oss amount included isfer property describ	that transferred substantially arded entity) to a specified 10 lines 12c and 12d, and go to mestic corporation a U.S. shalline 12d, and go to line 13. If in gross income as required ped in section 367(d)(4)?	y all of the 0%-owned line 13. areholder	rded entity) trans e assets of a fore d foreign corpora with respect to t	ign branch stion?	Yes No Yes No Yes No Yes No
Section C - Intangible	e Property Subj	ect to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pr on date of trans		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
			1	1		1
 Totals						1
				-		Form <b>926</b> (Pov. 11.2018)

Form **926** (Rev. 11-2018)

Forn	1926 (Rev. 11-2018) Maine Community Foundation, Inc.	01-0391479 Page 3
b	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii)   \$\Bigsim \Bigsim	Yes No
	oplemental Part III Information Required To Be Reported (see instructions)	
	e Maine Community Foundation transferred \$482,517 to Davi	
	ng-Term Distressed Opportunities International V (AIV-TE) x year in exchange for interest in the fund. This entity	
	sed in the Cayman Islands, and is registered with the Uni	
	e Fund invests in various foreign entities.	red beates bec.
	o rand invests in various rereign energies.	
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)	
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.	
	(a) Before	
17	Type of nonrecognition transaction (see instructions) ▶ Section 351	
18	Indicate whether any transfer reported in Part III is subject to any of the following.	
а	Gain recognition under section 904(f)(3)	Yes X No
b	Gain recognition under section 904(f)(5)(F)	Yes X No
С	Recapture under section 1503(d)	Yes X No
d	Exchange gain under section 987	Yes X No
19	Did this transfer result from a change in entity classification?	Yes X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	
	If "Yes," complete lines 20b and 20c.	
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	<b>&gt;</b> \$
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the	
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	
	covered by section 367(e)(1)? See instructions	Yes X No

224533 04-01-22

Form **926** (Rev. 11-2018)

# Department of the Treasury Internal Revenue Service

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

► Go to www.irs

► Go to www.irs.gov/Form926 for instructions and the latest information.	Attachment
► Attach to your income tax return for the year of the transfer or distribution.	Sequence No.

OMB No. 1545-0026

128

Part I U.S. Transferor Information (see instructions)	•
Name of transferor	Identifying number (see instructions)
Maine Community Foundation, Inc.	
	01-0391479
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?	Yes X No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by	
five or fewer domestic corporations?	
<b>b</b> Did the transferor remain in existence after the transfer?	X Yes No
If not, list the controlling shareholder(s) and their identifying number(s).	
Controlling shareholder	Identifying number
	37
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporati If not, list the name and employer identification number (EIN) of the parent corporation.	ion? X Yes No
Name of parent corporation	EIN of parent corporation
d. Have been adjusted and a continuous continuous description (007/a)/d) been made 0	Yes X No
d Have basis adjustments under section 367(a)(4) been made?	Yes X No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such und	der section 367),
complete questions 3a through 3d.	
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
Nume of partitionship	Ent of partnersing
b. Did the anatomatic law the annual school of action the bound of action of a strength and a	V N-
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	
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	□ Vaa □ Na
Part II Transferee Foreign Corporation Information (see instructions)	Yes
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Traine of transferee (totalgir corporation)	Ja Identifying Humber, if any
Davidson Kempner Income International LP	
6 Address (including country)	5b Reference ID number
C/O Davidson Kempner Income; 520 Madison Avenue	
New york, NY 10022	AC-7
7 Country code of country of incorporation or organization Cayman Islands	
8 Foreign law characterization (see instructions)	
Corporation	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
224531 04-01-22 LHA For Paperwork Reduction Act Notice, see separate instructions.	Form <b>926</b> (Rev. 11-2018)

	Regarding Tran	sfer of Property (see i	nstructi	ons)		
Section A - Cash						
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) arket value on e of transfer	<b>(d)</b> Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash	12/31/2022	proposity		915,100.		
10 Was cash the only pro	ainder of Part III and (					X Yes No
	pperty (otner tha	n intangible property (b)	Subjec	(c)	(d)	(e)
Type of property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
 Totals						
<ul> <li>12 a Were any assets of a foreign corporation? If "Yes," go to line 12b b Was the transferor a continuous of the line of li</li></ul>	foreign branch (included)  domestic corporation at is a foreign disregation at 12c. If "No," skip that transfer, was the dorporation?  ne 12d. If "No," skip oss amount included asfer property describ	that transferred substantially arded entity) to a specified 11 lines 12c and 12d, and go to mestic corporation a U.S. shall in gross income as required and in section 367(d)(4)?	y all of the 0%-owned line 13. areholder	rded entity) trans	ferred to a	Yes No Yes No Yes No Yes No
Section C - Intangible	Property Subjection	ect to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length proon date of trans		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						+
Totals					I	<u> </u>

Form	1926 (Rev. 11-2018) Maine Community Foundation, Inc.	01-0391479	Page 3
14 a	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life		¬.,
_	reasonably anticipated to exceed 20 years?		No
	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?	Yes	No
С	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section		<b>—</b> 1
	1.367(d)-1(c)(3)(ii) for any intangible property?	Yes	No
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable		
	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in		
	Regulations section 1.367(d)-1(c)(3)(ii)  \$\bigs\\$		
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any		
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	No
	plemental Part III Information Required To Be Reported (see instructions)		
	Maine Community Foundation transferred \$2,915,100 to D		
	come International LP in its 2022 tax year in exchange f		
	e fund. This entity is a hedge fund based in the Cayman		lis
	gistered with the United States SEC. The Fund invests in	various for	eign
ent	tities.		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before $4.370 \%$ (b) After $3.560 \%$		
17	Type of nonrecognition transaction (see instructions) ▶ Section 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes [	X No
b	Gain recognition under section 904(f)(5)(F)		X No
С	Recapture under section 1503(d)		X No
	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X No
20 a	If "Yes," complete lines 20b and 20c.	L 163	140
L-	•	•	
	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	▶ ⊅	
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		<b>—</b>
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		

Yes

# Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information. ► Attach to your income tax return for the year of the transfer or distribution.

OMB	No.	1545-0026

Attachment Sequence No. **128** 

Part I   U.S. Transferor Information (see instructions)	
Name of transferor Maine Community Foundation, Inc.	Identifying number (see instructions)
	01-0391479
<ul> <li>1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation.</li> <li>2 If the transferor was a corporation, complete questions 2a through 2d.</li> <li>a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) five or fewer domestic corporations?</li> <li>b Did the transferor remain in existence after the transfer?</li> <li>If not, list the controlling shareholder(s) and their identifying number(s).</li> </ul>	by Yes X No
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation.	poration? X Yes No
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(4) been made?  If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such complete questions 3a through 3d.  a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? 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)	
4 Name of transferee (foreign corporation)  Davidson Kempner Opportunities International VI	5a Identifying number, if any
6 Address (including country) 520 Madison Avenue, 30th Floor New york, NY 10022	5b Reference ID number 5107.73
7 Country code of country of incorporation or organization Cayman Islands	
8 Foreign law characterization (see instructions) Cayman Islands Exempted Company	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
224531 04-01-22 LHA For Paperwork Reduction Act Notice, see separate instructions.	Form <b>926</b> (Rev. 11-2018)

	Regarding Tran	sfer of Property (see in	nstructi	ons)		
Section A - Cash						
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) arket value on e of transfer	<b>(d)</b> Cost or other basis	(e) Gain recognized on transfer
	12/31/2022	1 1 7		409,928.		
10 Was cash the only pro	ainder of Part III and o					X Yes No
	pperty (otner tha	n intangible property (b)	Subjec	(c)	(d)	(e)
Type of property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						1
Inventory			+			
inventory						1
Other property (not listed under						
another category)						
			1			
Property with						
built-in loss						
Totals						
<ul> <li>12 a Were any assets of a foreign corporation? If "Yes," go to line 12b b Was the transferor a definition (including a branch that If "Yes," continue to line c Immediately after the transferee foreign corporate if "Yes," continue to line d Enter the transferred line </li> </ul>	foreign branch (included)  domestic corporation at is a foreign disregate 12c. If "No," skip transfer, was the domeoration?  ne 12d. If "No," skip oss amount included after property describes and questions 14a for the standard s	•	all of the 10%-owned line 13. reholder	rded entity) trans	ign branch ation?	Yes No Yes No Yes No Yes No Yes No Yes No
Section C - intangible	Property Subjection	ect to Section 307(a)				
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length pr on date of trans		(f) Income inclusion for year of transfer
			1			
Property described in sec. 367(d)(4)						
			1			
Totals						
						Form <b>926</b> (Rev. 11-2018)

Form	1926 (Rev. 11-2018) Maine Community Foundation, Inc.	01-0391479	Page 3
14 a b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii)   **Mass any intangible property transferred considered or anticipated to be, at the time of the transfer or at any	Yes	No No
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	☐ No
<u> </u>	Independed Doub III Information Described To De Described (see Section 15.2)		
	plemental Part III Information Required To Be Reported (see instructions)  Be Maine Community Foundation transferred \$409,928 to Dav	idson Kempn	
	portunities International VI in its 2022 tax year in exc.		<u></u>
	terest in the fund. This entity is a hedge fund based in		
	lands, and is registered with the United States SEC. The		
vai	rious foreign entities.		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 0.000 % (b) After 0.400 %		
17	Type of nonrecognition transaction (see instructions) ► Section 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)	Yes	X No
_			X No
b	Gain recognition under section 904(f)(5)(F)		X No
	Recapture under section 1503(d)  Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	<b>&gt;</b> \$	
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	☐ No
21			

Yes

# Department of the Treasury Internal Revenue Service

### Return by a U.S. Transferor of Property

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information. ► Attach to your income tax return for the year of the transfer or distribution.

OMB No. 15	545-0026
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Attachment Sequence No. **128** 

Part I U.S. Transferor Information (see instructions)					
Name of transferor Maine Community Foundation, Inc.		Identifying number (see instruction 01-0391479			structions)
		01-0			
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	n?	Ш	Yes	X	No
2 If the transferor was a corporation, complete questions 2a through 2d.					
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c))	by				
five or fewer domestic corporations?		$\square$	Yes	X	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	lden	tifying n	umber		
		37			1
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corp. If not, list the name and employer identification number (EIN) of the parent corporation.	ooration?	[ <b>A</b> ]	Yes		No
Name of parent corporation	EIN of p	arent co	orporat	ion	
					,
d Have basis adjustments under section 367(a)(4) been made?		$\square$	Yes	X	No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as suc	h under section	on 367).			
complete questions 3a through 3d.		,,			
<ul><li>a List the name and EIN of the transferor's partnership.</li></ul>					
a List the name and Lint of the transferor's partnership.					
Name of partnership	EIN	of partn	ership		
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)		<u>.                                      </u>	100		
4 Name of transferee (foreign corporation)	5a Id	lentifyin	a numb	er. if a	anv
The state of the s		<b>,</b>	<b>J</b>	,	,
Nut Tree Drawdown Offshore Fund LP					
6 Address (including country)	<b>5b</b> R	eference	ID num	ber	
Maples Corp Services Ltd; Ugland House, S. Church St					
Grand Cayman, Cayman Islands Ky1-1104 Cayman Islands	510	07.14	<u>l</u>		
7 Country code of country of incorporation or organization					
Cayman Islands					
8 Foreign law characterization (see instructions) Cayman Islands Exempted Company					
9 Is the transferee foreign corporation a controlled foreign corporation?			Yes	Х	No
224531 04-01-22 LHA For Paperwork Reduction Act Notice, see separate instructions.				_	1-2018)

11	Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?	Yes	No
12 a	Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a		
	foreign corporation?	Yes	No
	If "Yes," go to line 12b.		
b	Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch		
	(including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation?	Yes	No
	If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.		
С	Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the		
	transferee foreign corporation?	Yes	No
	If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.		
d	Enter the transferred loss amount included in gross income as required under section 91 ▶ \$		_
13	Did the transferor transfer property described in section 367(d)(4)?	Yes	N
	If "No " skin Section C and questions 1/a through 15		

Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer
Property described						
in sec. 367(d)(4)						
Totals						
	·	·		<u> </u>	Fo	rm 026 (Pov. 11 2019)

Form 926 (Rev. 11-2018)

Property with built-in loss

Totals

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

Form	1926 (Rev. 11-2018) Maine Community Foundation, Inc.	01-0391479	Page 3
b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?	Yes	□ No □ No □ No
d 15	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii)   \$\bigslim \bigslim \		□ No
	plemental Part III Information Required To Be Reported (see instructions)		
Of:	e Maine Community Foundation transferred \$2,100,000 to N fshore Fund LP in its 2022 tax year in exchange for inte is entity is a hedge fund based in the Cayman Islands, a th the United States SEC. The Fund invests in various fo	rest in the f nd is registe	und. ered
	<u> </u>		
Pai	rt IV Additional Information Regarding Transfer of Property (see instructions)		
	realistic for the second of th		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before $0.150 \%$ (b) After $0.150 \%$		
17	Type of nonrecognition transaction (see instructions) ► Section 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		_
а	Gain recognition under section 904(f)(3)		∑ No
b	Gain recognition under section 904(f)(5)(F)	······ — —	☑ No
С	Recapture under section 1503(d)	······ — —	∐ No
d	Exchange gain under section 987		∐ No
19	Did this transfer result from a change in entity classification?	— —	∑ No
<b>2</b> 0 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	Yes Y	Nο
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	<b>&gt;</b> \$	
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		_
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes L	∟ No
21	Did a demostic corporation make a coation 255 distribution of stock in a foreign controlled corporation		

Form **926** (Rev. 11-2018)

Yes

# Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information.

OMB No.	1545-0026

► 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 Maine Community Foundation, Inc.		Identifying number (see instructions) $01-0391479$			
<ul> <li>Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corpor</li> <li>If the transferor was a corporation, complete questions 2a through 2d.</li> <li>a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368 five or fewer domestic corporations?</li> <li>b Did the transferor remain in existence after the transfer?</li> <li>If not, list the controlling shareholder(s) and their identifying number(s).</li> </ul>	(c)) by	<u></u>	Yes Yes X Yes	X No X No No	
Controlling shareholder		Identifyin	g number		
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation.  Name of parent corporation			X Yes	□ No	
d Have basis adjustments under section 367(a)(4) been made?		[	Yes	X No	
<ul> <li>3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as complete questions 3a through 3d.</li> <li>a List the name and EIN of the transferor's partnership.</li> </ul>	such under	section 36	7),		
Name of partnership		EIN of pa	artnership		
Davidson Kempner Institutional Partners LP	13-359				
<ul> <li>b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?</li> <li>c Is the partner disposing of its entire interest in the partnership?</li> <li>d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establis securities market?</li> </ul>	shed	[	X Yes Yes Yes	No X No	
Part II Transferee Foreign Corporation Information (see instructions)		Fo. Islambid		if	
4 Name of transferee (foreign corporation)  DKIP (Cayman) Ltd. II		5a Identii	ying numb	er, if any	
6 Address (including country)		<b>5b</b> Refere	nce ID num	ber	
190 Elgin Avenue					
Grand Cayman, Cayman Islands KY1-9005 Cayman Islands 7 Country code of country of incorporation or organization CJ	<u> </u>	U-20			
8 Foreign law characterization (see instructions) Corporation					
9 Is the transferee foreign corporation a controlled foreign corporation?			Yes	X No	
224531 04-01-22 LHA For Paperwork Reduction Act Notice, see separate instructions.			Form <b>926</b> (I	Rev. 11-2018)	

Part III Information	Regarding Trans	sfer of Property (see i	nstructi	ons)		
Section A - Cash		<b>4</b> )			4.0	, ,
Type of	(a) Date of	<b>(b)</b> Description of		(c) arket value on	(d) Cost or other	<b>(e)</b> Gain recognized on
property  Cash	transfer 12/31/2022	property		e of transfer 402,982.	basis	transfer
10 Was cash the only pro If "Yes," skip the rema	operty transferred? ainder of Part III and g					X Yes No
Section B - Other Pro			subjec			(-)
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) arket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and securities						
Inventory						
Other property						
(not listed under						
another category)						
Property with			-			
built-in loss						
 Totals						
(including a branch the If "Yes," continue to lict Immediately after the transferee foreign cor If "Yes," continue to lict Immediately after the transferred Immediately after the transferred Immediately Immedia	domestic corporation to at is a foreign disregal ne 12c. If "No," skip lift transfer, was the dom poration?  ne 12d. If "No," skip lift loss amount included insfer property described and questions 14a the	hat transferred substantially rded entity) to a specified 10 nes 12c and 12d, and go to estic corporation a U.S. shame 12d, and go to line 13. In gross income as required ed in section 367(d)(4)?	y all of the 0%-owned line 13. areholder under se	e assets of a foreign d foreign corporation with respect to the	branch	Yes No Yes No Yes No Yes No
Section C - Intangible	e Property Subje	ct to Section 367(d)				1
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						
<del></del>					F	Form <b>926</b> (Rev. 11-2018)

X No

# Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information. ► Attach to your income tax return for the year of the transfer or distribution. OMB No. 1545-0026

Attachment Sequence No. **128** 

Part I U.S. Transferor Information (see instructions)					
Name of transferor Maine Community Foundation, Inc.	Identifying number (see instructions)				
<ul> <li>1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation.</li> <li>2 If the transferor was a corporation, complete questions 2a through 2d.</li> <li>a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 3 five or fewer domestic corporations?</li> <li>b Did the transferor remain in existence after the transfer?</li> </ul>	368(c)) by		Yes Yes Yes	X	
If not, list the controlling shareholder(s) and their identifying number(s).					
Controlling shareholder	Ide	ntifying n	umber		
c If the transferor was a member of an affiliated group filing a consolidated return, was it the pare	nt corporation?	X	Yes		No
If not, list the name and employer identification number (EIN) of the parent corporation.					
Name of parent corporation	EIN of	parent co	orporat	ion	
d Have basis adjustments under section 367(a)(4) been made?			Yes	X	No
<b>3</b> If the transferor was a partner in a partnership that was the actual transferor (but is not treated complete questions 3a through 3d.	as such under sec	tion 367),			
a List the name and EIN of the transferor's partnership.					
Name of partnership	Ell	N of partn	ership		
See supplemental statement					
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		X	Yes		No
c Is the partner disposing of its entire interest in the partnership?			Yes	X	No
<b>d</b> Is the partner disposing of an interest in a limited partnership that is regularly traded on an esta	blished				
securities market?		Ш	Yes	X	No
Part II Transferee Foreign Corporation Information (see instructions)  4 Name of transferee (foreign corporation)	50	Identifying	a numb	or if or	
4 Name of transferee (foreign corporation)  ZetaDisplay Acquisition (Holding), Ltd.	Ja	identilylli	y mamb	ei, ii ai	ıy
6 Address (including country)	5b	Reference	ID num	ber	
25 Savile Row					
London, England W1S 2ER United Kingdom	U-	-57			
7 Country code of country of incorporation or organization United Kingdom					
8 Foreign law characterization (see instructions) Corporation				[ <del></del> '	
9 Is the transferee foreign corporation a controlled foreign corporation?		<u>                                 </u>	Yes		No
224531 04-01-22 LHA For Paperwork Reduction Act Notice, see separate instructions.		Fort	m <b>926</b> (l	nev. 11	∠∪18)

Part III Information	Regarding Trans	sfer of Property (see i	instructi	ions)		
Section A - Cash			_			
Type of	(a) Date of	<b>(b)</b> Description of	Fair m	(c) narket value on	(d) Cost or other	<b>(e)</b> Gain recognized on
property	transfer	property		e of transfer	basis	transfer
Cash	12/31/2022			296,360.		
10 Was cash the only pro	ainder of Part III and g					X Yes No
Section B - Other Pro			subjec			(-)
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and securities						
Inventory						
Other property						
(not listed under						
another category)						
Property with						
built-in loss						
			-			
Totals						
12 a Were any assets of a foreign corporation?  If "Yes," go to line 12th  b Was the transferor a continue to limit of the transferee foreign corporation of the transferee foreign corporation of the transferee of the transferred of the trans	foreign branch (included)  domestic corporation at is a foreign disregate transfer, was the domporation?  ne 12d. If "No," skip lite oss amount included asfer property describes and questions 14a to	that transferred substantiall rded entity) to a specified 1 nes 12c and 12d, and go to lestic corporation a U.S. shame 12d, and go to line 13. in gross income as required ed in section 367(d)(4)?	y all of the 0%-owne o line 13. areholder	e assets of a foreigr d foreign corporation with respect to the	branch	Yes       No         Yes       No         Yes       No         Yes       No
Section C - Intangible	e Property Subje	ect to Section 367(a)		1	1	
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer
			+			
			_			
			+			
Property described			-			
in sec. 367(d)(4)						
			+		1	
			+		1	
			+		<u> </u>	
				<del>                                     </del>	<del> </del>	
Totals				I	F	<u> </u>

X No

Form 926 Statement 7

The Maine Community Foundation owns an interest in Davidson Kempner Institutional Partners LP, which made transfers to DKIP (Cayman) II, a Cayman Islands Corporation, during the 2022 tax year. The Foundation's share of these transfers to DKIP (Cayman) II was \$3,402,982. This entity is a hedge fund based in the Cayman Islands, and is registered with the United States SEC. The Fund invests in various foreign entities.

Form 926 Statement 8

The Maine Community Foundation owns interests in the following investment partnerships: Abrams Capital Partners I (EIN: 04-3455028), Riva Capital Partners IV, LP (EIN: 36-4804829), and Riva Capital Partners VI, LP (EIN: 83-1650405). The partnerships made transfers to ZetaDisplay Acquisition (Holding), Ltd., a United Kingdom-based Corporation, in 2022. The Foundation's total share of these transfers was in excess of \$100,000. ZetaDisplay Acquisition (Holding), Ltd. is a hedge fund based in the United Kingdom, and is registered with the United States SEC. The Fund invests in various foreign entities.