Form	990-T	1	Exempt Organization Busin	1055	Income Tax	Return	1	OMB No. 154	45-0687
			(and proxy tax under					മെ ₃	-
Donne	denend of the Town	For cale	endar year 2017 or other tax year beginning		, 2017, and ending	, 20		201	
Intern	rtment of the Treasury al Revenue Service		F Go to www.irs.gov/Form990T for instr	ziction	te and the latest into			Boon to Building	
$\overline{\Lambda}$	Check box if address changed	7 50	not enter SSN numbers on this form as it may be Name of organization (Check box if name of	e made	public if your organiz	ation is a 501		Open to Public In: 501(c)(3) Organiza	ations Only
B Exe	and under section		Boy Scouts of America	nangeo	and see instructions.)	1	D Emplo	yer identificatio	n number
1	501(c)(3)	Print	Number, street, and room or suite no. If a P.O. box		- t- coll-		(cirilin)	ryees' trust, see in	structions.)
	408(e) 220(e)	Type	1325 West Walnut Hill Lane	Y' RED R	natructions.		E Hamle	22-1576300 ted business act	h-la
	408A 🔲 630(a)	1300	City or town, state or province, country, and ZIP or	r forein	n nortal anda			rec pusiness act structions.)	Wity codes
	529(a)		Irving, TX 75038	ı ioraiği	ii postai code			i	
C Bpr	ok value of all assets	F Gr	oup exemption number (See instructions	11			511		00004
	1386074367	G Ch	leck organization type 🕨 📝 501(c) com	norati	on 🔲 501(c) tr	ust 🗀	401(a) t	1761	her trust
H C	escribe the organ	nization	s primary unrelated business activity	≥ Adı	toticine Devenue D				
	Int low local	MACO HIS	s corporation a subsidiary in an athliated dro	un or :	a narent-eubeidioa <i>r a</i>	ontrolled on	1 300001	Ig magazines	[Z] Mo
	TOO! OTHER HIS	manne e	nin incillianth until belot the pateut cure	oratio	on. ▶	omor gr	sop: .	1100	[A] 140
<u>J 1</u>	ne books are in c	are of 1	Stephanie PHillins			ne number	>	972-580-2	000
	Unrelated	Trade	e or Business income		(A) Income	(B) Exp	enses	(C) N	
1a		or sale	S 350620			5.4 sc	8 P. F.	7 1 2 3	797 61 - 1111 - 111 611
b	I AMPLIE DIE			1c	350620	(251200 - 2500 (ASIAN - 28-16	53.3		
2 3	Cost of goods	sold (S	chedule A, line 7) Exhibit 5	2	115333				S. 7.8.
	Gross profit. St	ubtract	line 2 from line 1c	3	235287			2352	
4a	Capital gain ne	I incom	ne (attach Schedule D) Exhibit 6	4a	58		7	43	58
p	Capital lans do:	Form 4	797, Part II, line 17) (attach Form 4797)	4b			421 122	100 100 100 100 100 100 100 100 100 100	
5	Joons (less) fee		of trusts . Exhibit 6	4c				S. C.	
6	winessie (loop) Hell	ıı henintə	i oi iiba arid a corpolations (strach statementi	5	1046727	7		10467	127
7	Tiprelated debt	cnedu	e C)	6					
8	Internet appuilles -		ed income (Schedule E)	7					
9	inciest amunics, n	oyames, a	and rents from controlled organizations (Schedule F)	8					
10	Exploited even	oi a seci	ion 501(c)(7), (9), or (17) organization (Schedule G)	9					
11	Advertising inco	pracii	vity income (Schedule I)	10					
12	Other Income (Sc	oo ineta	chedule J)	11	1284284	3960		-26763	115
13	Total Combine	linae 9	through 12	12	157350			1573	50
	Deductions	s Not 1	Taken Elsewhere (See instructions for	13	2723706	3960	599	-12368	93
	deductions	must t	be directly connected with the unrelate	umita d bus	ations on deductio	ns.) (Excep	ot for co	intributions,	
14	Compensation of	of office	ers, directors, and trustees (Schedule K)	פעום שי	iless income.)	56A (0.10)	144		
15	Salaries and wa	ges	· · · · · · · · · · · · · · · · · · ·	Exh	ibit 5	[경 중 중	14		
16	Repairs and ma			•	#0 #00#00	Section 100 100	16	1700	59
17	Bad debts .		THE RESIDENCE OF THE PROPERTY OF		#F #CC#25	00000 100	17		
18	Interest (attach :	schedu	ile)				18		
19	Taxes and licens	ses.			nibit 5	0.00	19		<u> </u>
20	Charitable contr	ibution	s (See instructions for limitation rules) .		20,270,000	101 201	20		20
21	Depreciation (at	tach Fo	orm 4562)	. 83	. 21	97	77 TUSES 11.3. FS		
22	Less depreciation	on clain	ned on Schedule A and elsewhere on reti	uro .	22a		22b		
23	Depletion			. (6)	\$ 00000	% # P	23	1	+-
24 25	Courting for	getem	ed compensation plans	. (6)	(988) 6	4 1 6 8	24		
26	Employee pener	it progi	rams	Exi	nibit 5	8 8 8	25	4038	89
27	Excess exempt	expens	es (Schedule i)	(<u>*</u>)	1 (00000 00		26		
28	Other deduction	iip cosi	ts (Schedule J)	್ ಕ್ಲ್	hibit's	× × × ×	27		
29	Total deduction	obine) e	ch schedule)			5 G · ·	28	30789	98
30	Unrelated busine	iei MUO see tev-	lines 14 through 28	*	95.81.30	* * * *	29	56749	36
31	Net operating los	es yayı	able income before net operating loss dec uction (limited to the amount on line 30)	ottour حص	n. Subtract line 29 f	rom line 13		-180438	39
32	Unrelated husing	egg tav	able income before specific deduction. S	ناچ سامان را	withter 4		31	 	
33	Specific deduction	on (Ger	nerally \$1,000, but see line 33 Instruction	STIQUE	or ine 31 from line	30	32	-180438	19
34	OHERIALED DUSIN	iess ta	Xanie income Subtract line 99 from line	- 00 1	Ellina DO ta aurantania	16- 11	33		+-
	enter the smaller	of zer	o or line 32		une oo is greater	IIIC 32			_ [
For Pa	perwork Reduction	n Act No	otice, see instructions.		Cat. No. 11291J		34	-180438	
					var. No. 11291J			Form 990-	· » (2017)

Farm 0	00 T maam		
Part	90-T (2017) III Tax Computation		Page 2
35	Organizations Taxable as Corporations. See instructions for tax computation. Controlled group	L ri-sensi	
	members (sections 1561 and 1563) check here See Instructions and:		
a	Enter your share of the \$50,000, \$25,000, and \$9,925,000 taxable income brackets (in that order):	300	i
	(1) \$ (2) \$ (3) \$		
b	Enter organization's share of: (1) Additional 5% tax (not more than \$11,750)	Link	1
	(2) Additional 3% tax (not more than \$100,000)	-146/4	
C	Income tay on the amount on line 24	05-	
36	Trusts Taxable at Trust Rates. See instructions for tax computation. Income tax on	35c	
	the amount on line 34 from: Tax rate schedule or Schedule D (Form 1041)		1
37	Proxy tax. See instructions	36	
38	Alternative minimum tax	37	
39	Tax on Non-Compliant Facility Income. See instructions	38	_
40	Total. Add lines 37, 38 and 39 to line 35c or 36, whichever applies	40	
Part	IV Tax and Payments	40	
41a	Foreign tax credit (corporations attach Form 1118; trusts attach Form 1118) . 41a	FEST	
þ	Other credits (see instructions)		
C	General business credit. Attach Form 3800 (see instructions)		
d	Credit for prior year minimum tax (attach Form 8801 or 8827) . 41d	, de	
e	Total credits. Add lines 41a through 41d	41e	- 1
42	Subtract line 41e from line 40	42	
43	Other taxes. Check if from: Form 4255 Form 8611 Form 8697 Form 8866 Other (attach schedule) .	43	
44	Total tax. Add lines 42 and 43	44	
45a	Payments: A 2016 overpayment credited to 2017	PROPERTY OF	
b	2017 estimated tax payments		
C	Tax deposited with Form 8868		
d	Foreign organizations: Tax paid or withheld at source (see instructions) 45d	* * *	
0	Backup withholding (see instructions)	F	
f	Credit for small employer health insurance premiums (Attach Form 8941) 45f		
g	Other credits and payments: Form 2439		
	☐ Form 4136 ☐ Other Total ▶ 45α	100	
46	Total payments. Add lines 45a through 45g	46	
47	Estimated tax penalty (see instructions). Check if Form 2220 is attached	47	
48	Tax due. If line 46 is less than the total of lines 44 and 47, enter amount owed	48	
49	Overpayment. If line 46 is larger than the total of lines 44 and 47, enter amount overpaid	49	
50	Enter the amount of line 49 you want: Cradited to 2018 estimated tax	50	
Part	The state of the s		
51	At any time during the 2017 calendar year, did the organization have an interest in or a signature or ot	her authority	Yes No
	over a financial account (bank, securities, or other) in a foreign country? If YES, the organization may	v have to file	18. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.
	FinCEN Form 114, Report of Foreign Bank and Financial Accounts. If YES, enter the name of the for	eign country	
EP	here Bahamas, Canada		1
52	During the tax year, did the organization receive a distribution from, or was it the grantor of, or transferor to, a fore	ign trust? .	1
EO	If YES, see instructions for other forms the organization may have to file.		## - Y
53	Enter the amount of tax-exempt interest received or accrued during the tax year ▶ \$		多数 第
Sian	Under panalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.	t of my knowledge	and bellef, it is

	-		or empression trouble of	was it the Aleitor of o	i italisieioi io, a	ioreign trustr	. 🗸
	If YES,	see instructions for other forms the	organization may hav	e to file.	•	•	3873 A 1767
53	Enter t	he amount of tax-exempt interest rec	eived or accrued du	ring the tax year	\$		要
Sign Here	true, c	penalties of perjury, I declare that I have examine correct, and complete. Declaration of preparer (other turns of officer	d this return, including seco	mnanuing echadulae and et	atements, and to the arer has any knowle	May the IRS with the pre	edge and bellef, it is discuss this return sarer shown below the image. The image is not below the image.
Paid		Print/Type preparer's name	Preparer's signature	>	Date	Check if	PTIN
Prepa	arer	Travis L. Patton	1-1		09/18/2018	self-employed	P00389623
Use (Firm's name ► PricewaterhouseCoor	oers, LLP; 600 13th St	reet NW, Suite 1000		Firm's EIN ►	13-4008324
		Firm's address ➤ Washington, DC 2000	05-3005				02-414-1000
				-			rm 990-T (2017)

(Rev. January 2017)

Application for Automatic 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. OMB No. 1545-1709

Department of the Treasury Internal Revenue Service

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filling of this form, visit www.irs.gov/efile, click on Charities & Non-Profits, and click on e-file for Charities and Non-Profits. Automatic 6-Month Extension of Time. Only submit original (no copies needed). All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns. Enter filer's identifying number, see instructions Name of exempt organization or other filer, see instructions. Type or Employer identification number (EIN) or print Boy Scouts of America 22-1576300 Number, street, and room or suite no. If a P.O. box, see instructions. File by the Social security number (SSN) due date for 1325 West Walnut Hill Lane filing your City, town or post office, state, and ZIP code. For a foreign address, see instructions. instructions Irving, Texas 75038-3008 Enter the Return Code for the return that this application is for (file a separate application for each return) 0 7 Application Return Application Is For Return Corle is For Code Form 990 or Form 990-EZ 01 Form 990-T (corporation) 07 Form 990-BL 02 Form 1041-A 08 Form 4720 (individual) Form 4720 (other than individual) 03 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 ► Stephanie Phillips, Controller; 1325 W Walnut Hill Ln; Irving, TX 75038-3008 Telephone No. ▶ 972-580-2300 Fax No. ▶ 972-580-2594 If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) a list with the names and EINs of all members the extension is for. I request an automatic 6-month extension of time until November 15, 20 18, to file the exempt organization return for the organization named above. The extension is for the organization's return for: ► ☑ calendar year 20 17 or ▶ ☐ tax year beginning _______, 20 _____, and ending _______, 20 _____. If the tax year entered in line 1 is for less than 12 months, check reason:

Initial return

Final return

3a If this application is for Forms 990-BL, 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less

b If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and

Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by

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

estimated tax payments made. Include any prior year overpayment allowed as a credit.

using EFTPS (Electronic Federal Tax Payment System). See instructions.

☐ Change in accounting period

instructions.

any nonrefundable credits. See instructions.

3a \$

3b



Department of the Treasury Internal Revenue Service Ogden UT 84201

Notice	CP211A						
Tax period	December 31, 2017						
Notice date	April 9, 2018						
Employer ID number	22-1576300						
To contact us	Phone 1-877-829-5500						
	FAX 801-620-5555						

Page 1 of 1

133105.697114.200859.10202 1 AB 0.408 373

BOY SCOUTS OF AMERICA STEPHANIE PHILLIPS 1325 W WALNUT HILL LN IRVING TX 75038-3008



133105

Important information about your December 31, 2017 Form 990T

We approved your Form 8868, Application for Extension of Time To File an Exempt Organization Return

We approved the Form 8868 for your December 31, 2017 Form 990T.

Your new due date is November 15, 2018.

What you need to do

File your December 31, 2017 Form 990T by November 15, 2018.

Visit www.irs.gov/charities to learn about approved e-File providers, what types of returns can be filed electronically, and whether you are required to file electronically.

Additional information

- Visit www.irs.gov/cp211a
- For tax forms, instructions, and publications, visit www.irs.gov or call 1-800-TAX-FORM (1-800-829-3676).
- Keep this notice for your records.

If you need assistance, please don't hesitate to contact us.

Form 990-T (2017)							
Schedule A—Cost of Go	ods Sold, Fr	er method of	Invent	on wolvet	lan b		Page (
1 Inventory at beginning	o of year	1617	uiveiit	ory valuat	ion P	lower of average cost or	market
2 Purchases		1017		6 Inv	entory	at end of year	6 182750
3 Cost of labor		2 1363 3	49	7 Co	st of	goods sold. Subtract	
4a Additional section 2	63A costs	-		line	6 fror	n line 5. Enter here and	
f=41 - 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		_				ne 2	7 115333
b Other costs (attach so				8 Do	the ru	les of section 263A (w	ith respect to Yes No
5 Total. Add lines 1 thre	niedule) 4	b		pro	perty p	produced or acquired for	r resale) apply
Schedule C-Pent Incon	ough 4b	2980	B3	to t	he orgi	anization?	
Schedule C-Rent Incon (see instructions)	ite (LIOITI 1489	Property ar	ia Pers	sonal Pro	perty	Leased With Real Pr	operty)
1. Description of property							
(1)							
(2)							
(3)							
(4)							
W	D. Dont waste						
637	2. Rent received						
 (a) From personal property (if the personal property is more than 	rcentage of rent	(b) From real a	ınd parso	nai property (ii	f the	3(a) Deductions directly	y connected with the income
more than 50%)	I IOSA DOLINOL	percentage of ren 50% or if the ren	for nore	nnai neocorba	-bearing	In columns 2(a) an	d 2(b) (attach schedule)
(1)			- 10 Deseq	on pront or in	icome)		
(5)							
(3)							
(4)							
Total		otal					
(c) Total income. Add totals of c	olumns 2(a) and :	2(b). Enter				 (b) Total deductions. Enter here and on page 	4
nere and on page 1. Part I, line 6.	column (A)					Part I, line 6, column (B)	
Schedule E-Unrelated D	ebt-Financed	Income (see	instruc	tions)		(2)	
1. Description of de	ebt-financed propert	v	2. Gro	oss income fro	om or	Deductions directly condebt-finance	nnected with or allocable to ced property
		•	- GIIOGEI	property	ariceu	(a) Straight line depreciation	(b) Other deductions
(1)						(attach schedule)	(attach schedule)
(2)			 				
(3)			┼──				
(4)			-		\rightarrow		
4. Amount of average	5. Average a	djusted basis					
acquisition debt on or allocable to debt-financed	of or allo	cable to	!	6. Column	1	7. Gross income reportable	8. Allocable deductions
property (attach schedule)	debt-financ	ed property chedule)		4 divided by column 5		(column 2 × column 6)	(column 6 x total of columns
(1)	farma i a	onedula)					3(a) and 3(b))
(2)			-		%		
(3)					%		
(4)	 		 -		%		
5.4	<u> </u>		<u> </u>		%		
					T	Enter here and on page 1,	Enter here and on page 1,
Totals						Part I, line 7, column (A).	Part I, line 7, column (B).
					. ▶		
Total dividends-received deduct	ions included in c	olumn 8					

Schedule F-Interest, Ann	uities	. Rovalties.	and Re	nts From	Controlled Or	ranizatione /e/	no linetruo	tional	- rage -	
		,,,	Exemp	t Controller	Organizations	Januzauons (si		tions)		
Name of controlled organization		2. Employer ification number	3. Net un	related Income e instructions)	4. Total of specifie	d 5. Part of column included in the organization's gr	controlling	cons	Peductions directly nected with income in column 5	
(1)								-		
(2)								-		
(3)									····	
(4)								 -		
Nonexempt Controlled Organiz	ation	S								
				T	· ·	do bet declar				
7. Taxable Income		. Net unrelated inc loss) (see instructi			otal of specified yments made	10. Part of colur Included in the organization's gr	controlling	11. Deductions directly connected with income in column 10		
(1)										
(2)										
(3)										
(4)										
Add columns 5 and 10. Enter here and on page 1. Part I, line 8, column (A). Totals										
Schedule G-Investment I	ncon	ne of a Secti	on 501	(0)(7) (0)	or /17) Organi	wation (see in-				
1. Description of Income		2. Amount of		3. direc	Deductions ctly connected	4. Set-aside (attach sched	18	5. Te	otal deductions et-asides (col. 3	
(1)				(att	ach schedule)	farmen series	-		plus coi. 4}	
(2)	\dashv									
(3)	-		_							
(4)										
Totals	•	Enter here and Part I, line 9, co	olumn (A)		Advertising In	come (see ins	40	Inter he Part I, ti	re and on page 1, ne 9, column (B).	
Description of exploited activit		2. Gross unrelated business incon from trade or business	a, con pro	Expenses directly nected with aduction of threlated ness 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. Expe attribute colum	ble to	7. Excess exempt expenses (column 6 minus column 5, but not more than column 4).	
(1)										
(2)							_			
(3)										
(4)										
Totals	. >	Enter here and page 1, Part I line 10, col. (A	, pag	hera and on pe 1, Part I, 10, col. (8).				marin Marin	Enter here and on page 1, Part II, line 26.	
Schedule J—Advertising Ir	icom	e (see instruc	tions)							
Part I Income From Pe	Priodi	icais Report	ed on a	onsolic	dated Basis					
1. Name of periodical		2. Gross advertising income		3. Direct rtising costs	4. Advertising gain or (loss) (col. 2 minus col. 3), if a gain, compute cols. 5 through 7.	5. Circulation income	6. Reade		7. Excess readership costs (column 6 minus column 5, but not more than column 4).	
(1) Consolidated Periodicals - Ext	ibit 1	12842	84	3960599					THE PERSON NAMED IN	
(2)					1 1 1 1 1 1 1 1				les Transition	
(3)		-								
(4)		 								
Totals (carry to Part II, line (5)) .	. ▶	12892	84	3960599	-2676315					
								F	orm 990-T (2017)	

Income From Periodicals Reported on a Separate Basis (For each periodical listed in Part II, fill in columns Part II 2 through 7 on a line-by-line basis.) 4. Advertising gain or (loss) (col. 2 minus col. 3). If 7. Excess readership 2. Gross 3. Direct advertising costs costs (column 6 5. Circulation 6. Readership 1. Name of periodical advertising minus column 5, but not more than income costs Income a gain, compute cols. 5 through 7. column 4). <u>(1)</u> (2) (3) (4) Totals from Part I Enter here and on Enter here and on Enter here and page 1, Part I, line 11, col. (A). page 1, Part I, line 11, col. (B). on page 1, Part II, line 27. Totals, Part II (lines 1-5) . Schedule K-Compensation of Officers, Directors, and Trustees (see instructions) 3. Percent of time devoted to business 4. Compensation attributable to unrelated business 1. Name (1) 96 (2) % (3) % (4) % Total. Enter here and on page 1, Part II, line 14 ▶

Form 990-T (2017)

BOY SCOUTS OF AMERICA 22-1576300 2017 FORM 990-T, SCHEDULE J, PART I Consolidated Periodicals 12/31/17

	Description		
	Boys' Life	Scouting	Total
Advertising Sales (See Exhibits 2 and 3) Less: Intracompany Advertising Sales	742,357	541,927	1,284,284
	0	0	0
Net Advertising Sales	742,357	541,927	1,284,284
Advertising Expenses	2,633,681	1,326,917	3,960,599
Less: Cost on Intracompany Sales	0	0	0
Net Advertising Expenses	2,633,681	1,326,917	3,960,599
NET GAIN (LOSS)	(1,891,324)	(784,990)	(2,676,315)

BOY SCOUTS OF AMERICA Boys' Life Magazine 22-1676300 IRS FORM 990-T 12/31/17

EXHIBIT 2

		ADVERTISING	READERSHIP	TOTAL	LESS 50%	GROSS	· · · · · · · · · · · · · · · · · · ·
CTR		REVENUE/	REVENUE!	REVENUE!	MEALS &	REVENUES/	ADVERT
#	DESCRIPTION	EXPENSE	EXPENSE	EXPENSE	ENTERTAINMENT	EXPENSES	ALLOC
		Column F=D*A	Column E= D-F	Column D= B-C	Column C	Column B	Column A
l	REVENUES:]					
1570	Reprint Feature Sales]	95.29	95.29		95.29	
1570	Program Planning Package		30,614.84	30,614.84		30,614,84	
1870	Boy's Life Video		87.80	87.80		87.80	
		1					
1570	Other Revenues		29,834.62	29,834.62		29,834.62	
1621	Subscriptions		8,701,331.17	8,701,331.17		8,701,331.17	
1621	Single Copy Sales	l i	19,849.76	19,849.76		19,849.76	
1621	Advertising Sales	742,367.23		742,367.23		742,357,23	
1610	Other Revenue		20,869,64	20,869.64		20,859,54	
İ							
	TOTAL REVENUES						
	ICIAL REVENUES	742,357.23	8,802,683,02	9,545,040.25	0.00	9,545,040.25	
	ALLOCATED EXPENSES:						
1510	Boy's Life Editorial	127,171.00	925,274,00	4 = == 4 + = 4	****		
1531	Design/Photo	49,326.00	362,993,46	1,052,445.00	(449.09)	1,052,894.09	12.08339%
1551	Circularization/ Distribution	300,029.00		402,319.46	0.00	402,319.46	12.26503%
1601	Magazine Production	532,154.00	2,146,192.86 3,806,628.80	2,446,221.86	0.00	2,446,221.86	12.26503%
1811	Magezine Div Publisher	35,906.00	256,148.66	4,338,782.80 292,054.66	0.00	4,338,782.80	12.26603%
1821	Administrative Accounts	129,815.00	1,036,457.04	1,166,272,04	(721.49)	292,776.14	12.26503%
		(20,010,00	1,040,101,104	1,100,212.04	0.00	1,166,272.04	11.13076%
		1,174,401,00	8,523,694.81	9,698,095,81	(1,170,58)	9,699,266,39	
				0,000,000	(1)11-110-7	50,001,00,00	
	DIRECT EXPENSES:						l
						ŀ	ļ
1521	Editorial		0.00	0.00		0.00	
1540	Circulation Service Dir		568,962.14	568,962.14	(51.10)	569,013,24	
1881	Customer Service	0.00	94,191.00	94,191.00	0.00	94,191.00	
1570	Program Planning	l	29,167.93	29,167.93		29,167.93	
1581	Advertising Sales Administration	1,327,687.32		1,327,687.32	(8,991.08)	1,338,678.40	
1591	Advertising Sales Promo/Research	131,592.97		131,592.97	(181.73)	131,774.70	
							ļ
	TOTAL DIDECT EVENIANA						
	TOTAL DIRECT EXPENSES	1,459,280.29	692,321.07	2,161,601.37	(9,223.91)	2,160,825,28	
	TOTAL EXPENSES	2 622 624 60	6.646.645.65	44 040 45	*****	44.000	
	O INW DAT ENOUG	2,633,681.29	9,216,015.88	11,849,697.18	(10,394,49)	11,860,091.67	
	NET GAIN (LOSS)	(1,891,324.06)	(413,332.86)	/2 204 EEE BAS	40.004.40	10 949 534 533	1
	Innant	[1,031,3£4,06]]	(4.13,33£,Rb)	(2,304,656.93)	10,394.49	(2,315,061.42)	

Allocation percentages are based on various factors of time and materials used in advertising revenue production.

BOY SCOUTS OF AMERICA Scouting Magazzine 22-1576300 IRS FORM 990-T 12/31/2017

EXHIBIT 3

				ALLOCABLE			
		ADVERTISING	READERSHIP	INCOME	LESS 50%	GROSS	ŀ
COST		REVENUE!	REVENUE/	TOTAL	OF MEALS &	REVENUES/	ADVERTISING
CTR#		EXPENSE	EXPENSE	REVENUE/EXPENSE	ENTERTAINMENT	EXPENSES	ALLOCATION
		Column F≃D*A	Column E= D-F	Column D= B-C	Column C	Column B	Column A
	REVENUES:						
1622	Earned Subscriptions	i					
1622	Advertising Sales		1,660,471.02	1,650,471.02		1,650,471.02	
1622	Single Copy Sales	541,926.56		541,926.66		541,926.56	
1622	Insert Income		0.00	0.00		0.00	
1622	Production Fees		0.00	0.00		0.00	
1000	Liodichall Lags		0.00	0.00		0.00	i
	TOTAL SALES	541,926.56	1,650,471.02	2,192,397,58	0.00	2,192,397,58	
	ALLOCATED EXPENSES:				İ		į
1532	Magazine Design/Photo	46,943,00	133,332,21	450.075.04			
1552	Distribution / Circulation Expe	268,485.00	762,562.79	180,275.21	0.00	180,275.21	26.040%
1602	Magazine Production	363,784,00	1,033,239.32	1,031,047.79	0.00	1,031,047.79	28.040%
1612	Publishing Administration	25,435.00	71.998.14	1,397,023.32	0.00	1,397,023.32	26.040%
1622	Scouting Administration	135,177.00	383,935,84	97,433.14 519,113,84	(240.50)	97,673.64	26.040%
				818,113.04	0.00	519,113.84	26.040%
		839,824.00	2,385,069.30	3,224,893.30	(240.50)	3,225,133,80	
	DIRECT EXPENSES:		i				
1522	Scouting Magazine Editor	ļ	528.419.08	200 440 00			1
1662	Customer Service	0.00	23,258,04	528,419.08	(168.07)	528,587.14	l l
1582	Advertising Sales Admin	436,440,18	20,200.04	23,268.04	0.00	23,258.04	
1692	Advertising Sales Promo/Resi	50,652,84		436,440.18	(2,997.04)	439,437,21	
				60,652.84	(121.15)	50,773,99	
		487,093.02	551,677.12	1,038,770.14	(3,286.25)	1,042,056.39	
	TOTAL EXPENSES	1,326,917.02	2,936,746.42	4,263,663.44	(3,526.75)	4,267,190.19	
	NET GAIN (LOSS)	(784,990.46)	(1,286,275.40)	(2,071,265.86)	3,626,75	(2,074,792.61)	

Allocation percentages are based on various factors of time and materials used in advertising revenue production.

Boy Scouts of America 22-1576300 Net Operating Loss Deduction Amount Available for Future Years 2017 Form 990-T, Page 1, Line 31

					· · · · · · · · · · · · · · · · · · ·
		Year	Capital	30%	50%
	İ	Loss	Loss	Contribution	
Year	Loss	Expires	Carryforward		
				COLLATORNALO	Carrytorward
1998	1,618,004	2018			
1999	1 '	2019			
2000	762,190	2020			
2003	'	2021	İ		
2002		2022			
2003		2023			
2004	2,109,869	2024			
2005	1,510,529	2025			
2006		2026			
2007	2,961,950	2027		j	
2008	2,527,010	2028		i	
2009	2,416,214	2029			
2010	1,653,152	2030			
2011	2,677,541	2031			
2012	3,125,794	2032			
2013	3,167,483	2033			
2014	1,772,279	2034	3,681	187	3,450
2015	1,491,967	2035	(3,681)	-2.	998
2016	1,638,038	2036	. ,	28	168
2017	1,804,389	2037		803	4,894
-					.,
TOTALS	38,703,900		0	1,018	9,510

BOY SCOUTS OF AMERICA 22-1576300 FORM 990-T, PAGE 1, PART I OTHER SALES ACTIVITIES STATEMENT OF INCOME AND EXPENSE 12/31/2017

Total	350,620	115,333	235,287		179,559	40,389	2,312	108,547	25,934	75	23,312	610	70,770	65,554	398	10,387	39,650	567,496	(\$332,209)
Philmont Jewelry Sales *	77,249	42,385	34,864		30,222		2,312	1,593										34,127	\$737
Philmont Cattle Operations	216,668	28,155	188,513		0	89	0	14,636	25,934	75	1,973	610	0	65,554	398	10,387	39,650	159,284	\$29,229
Northern Tier Jewelry Sales *	0	0	0															0	\$0
Florida Sea Base Jewelry Sales *	7,293	4,738	2,555															0	\$2,555
Reserve Collection Sales *	49,410	40,055	9,355		149,337	40,321		92,318			21,339		077,07					374,084	(\$364,729)
	GROSS SALES	COST OF GOODS SOLD	GROSS PROFIT	DIRECT OPERATING EXPENSES:	SALARIES AND WAGES	EMPLOYEE BENEFITS	PAYROLL TAXES	SUPPLIES	TERD	MESCELLANEOUS	TRAVEL	DUES AND SUBSCRIPTIONS	INDEPENDENT CONTRACTORS	MANAGEMENT SERVICES	MAINTENANCE AND REPAIRS	INSURANCE	TAXES	TOTAL	NET INCOME (LOSS)

* Sales of jewelry at high adventure bases includes flems that are not related to the Scouting program. Reserve Collection sales include recognition items sold through Supply.

BOY SCOUTS OF AMERICA 22-1576300 2017 FORM 990-T, PART I, Line 5 Income (loss) from partnerships

EIN	Name	income (expense)
			Form 990-T Line 4a
		Form 990-T Line 5	and Schedule D
	Karpreilly Capital Partners LP	556,215	0
26-2474514	BSA Commingled Endowment Fund LP	(34,885)	13
27-1628714	Thoma Bravo Fund IX AIV LP	(3,362)	0
	GTCR Fund X/B LP	(23,252)	(28)
	Thoma Bravo Fund X, LP	1,118	0
	Karpreilly Capital Partners II	665,164	0
	GTCR Fund XI/B LP	(115,873)	73
	Compass Diversified Holdings	0	0
61-1590801	· · ·	318	0
	Adreessen Horowitz Fund III (AIV), LP	(948)	0
Foreign	Waterland Private Equity Fund V C.V.	0	0
	State Street MSCI ACWI EX USA Index	199	0
	State Street MSCI ACWI EX USA Index	66	0
27-6455179	STATE STREET GLOBAL REAL ESTATI	1,968	0
	Totals	1,046,727	58

Exhibit 7

BOY SCOUTS OF AMERICA 22-1576300 SPONSORSHIP UNRELATED BUSINESS INCOME FORM 990-T, PAGE 1, LINE 12 12/31/2017

Name	2017 income recorded	2% return benefit limit	FMV of sponsor- ship benefits	UBI	QSP	Cost to BSA
Daisy Outdoor Products	25,000	500	9,350	9,350	15,650	-
FCA US LLC	25,000	500	4,000	4,000	21,000	_
Vista Outdoor Operations LLC	395,307	7,906	144,000	144,000	251,307	3
Totals	445,307	8,906	157,350	157,350	287,957	-

Entity Classification Election

OMB No. 1545-1516

HIRDHI IGI	Makanna onlace	strugger growth cult goes sug in the menochous is at while he boardows	232.				
_	Name of stigible entity making Analytico B.V.		Employer ide	ntification number			
Typ		norm or suffie no. If a P.O. box, see instructions.					
OI	CID MUCHINING FITS, CA. III	v., Nieuwe's-Gr <u>ave</u> landseweg 17					
Prir	I Cit's no fouts! Smits! Blift Yils CO.	e. If a foreign address, enter city, province or state, postal code and country, Follow	the country's pr	actice for entering the			
	postal cods.			•			
- 0	1405 HK Bussum, The Ne						
► U	neck if: Address change		009-41				
Pari	LI Relief for a late of Election Information	ange of entity classification election sought under Revenue Proce	<u>:dure 2010-3</u>	2			
ran	Election informatio	<u> </u>					
1	Type of election (see instr	uctions):					
a b	☑ Initial classification by a ☐ Change in current classi	newly-formed entity. Skip lines 2a and 2b and go to line 3. lication. Go to line 2a.					
2a	Has the eligible entity previous	usly filed an entity election that had an effective date within the la	st 60 months	7			
	☐ Yes. Go to line 2b. ☐ No. Skip line 2b and go	to line 3.					
2b	Was the eligible entity's priormation?	r election an initial classification election by a newly formed entity	that was effe	ective on the date of			
	Yes. Go to line 3. No. Stop here. You gene	rally are not currently eligible to make the election (see instruction	ıs).				
3	Does the eligible entity have	more than one owner?					
	Yes. You can elect to be No. You can elect to be to line 4.	ciassified as a partnership or an association taxable as a corporation ciassified as an association taxable as a corporation or to be disre	n. Skip ilne 4 : garded as a	and go to line 5. separate entity. Go			
4	If the eligible entity has only	one owner, provide the following information:					
а	Name of owner ► WPEF VI	Holding Cooperatief W.A.					
Ь	identifying number of owner		7 7 7 7 7 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8				
5	If the eligible entity is owned employer identification numb	by one or more affiliated corporations that file a consolidated retuer of the parent corporation:	ırn, provide t	ne name and			
a	Name of parent corporation						
b	Employer identification numb	er >					

or Pap	erwork Reduction Act Notice,	see instructions, Cal. No. 22588R	Fe	rm 8832 (Rev. 12-2018)			

Form 8	132 (Rev. 12-20	13)					Paga 2
Part	L Elect	tion information (C	Continued)				. aga a
6	Type of en	tity (see instructions):				
а	☐ A dome	estic eligible entity ele	cting to be cla	assified as an as	sociation taxable	as a cornoration.	
Ь							
0	D A domestic eligible entity with a single owner electing to be disregarded as a separate entity.						
d	A foreign eligible entity electing to be classified as an association taxable as a corporation.						
e	☐ A foreig	n eligible entity electi	ng to be class	sified as a partne	ership.		
f	☑ A foreign eligible entity with a single owner electing to be disregarded as a separate entity.						
7	If the eligible entity is created or organized in a foreign jurisdiction, provide the foreign country of organization ▶ Netherlands						
8	Election is	to be effective beginn	ing (month, da	ay, year) (see in:	structions)	4/13/20	16
9	Name and	title of contact person	whom the IR	S may call for π	nore information	10 Contact person's telephone numb	BF
	Michaela Mo	orr, Clifford Chance US	LLP			212-878-8156	
		Con	sent Staten	nent and Sign	ature(s) (see ins	structions)	
ipove, electio	inder penalties of perjury, I (we) declare that I (we) consent to the election of the above-named entity to be classified as indicated bove, and that I (we) have examined this election and consent statement, and to the best of my (our) knowledge and belief, this lection and consent statement are true, correct, and complete. If I am an officer, manager, or member signing for the entity, I further eclare under penalties of perjury that I am authorized to make the election on its behalf.						
	P	Signature(s)		Da	ite	Title	
	1_			9/25/	17 Dir	ector of Waterland Private Equity	
-/					Inv	estments B.V. as director of WPEF VI Haldin	ig .
					Co	operatiof W.A.	
				I	I I		

11 Provide the explanation as to why the entity classification election was not filed on time (see instructions). Analytico B.V. ("Analytico") was formed on April 13, 2016. Although Analytico Intended to elect to be treated as a disregarded entity for U.S. federal income tax purposes beginning as of formation on April 13, 2016, Analytico inadvertently failed to						
disregarded entity for U.S. federal income tax purposes beginning as of formation on April 13, 2016, Analytico inadvertently failed to						
— · ·	Analytico B.V. ("Analytico") was formed on April 13, 2016. Although Analytico Intended to elect to be treated as a					
	disregarded entity for U.S. federal income tax purposes beginning as of formation on April 13, 2016, Analytico inadvertently failed to					
file the IRS Form 8832 Entity Classification Election within the required time period. After discovering this failure to file the Form 8832,						
Analytico took the appropriate steps to gather the necessary information and prepare and file the Form 8832 in a manner consistent will	its					
original intention pursuant to Rev. Proc. 2009-41.						
Index paneling of position I found deploy that I found						
Under penalties of perjury, I (we) declare that I (we) have examined this election, including accompanying documents, and, to the of my (our) knowledge and belief, the election contains all the relevant facts relating to the election, and such facts are true, corre and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (further declare that I be elected for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.	- 4					
Signature(s) Date Title						
9 25 177 Director of Waterland Private Equity						
investments B.V. as director of WPEF VI Holdin	er					
Gobperatlef W.A.						
	_					
	_					
	_					
	_					

Entity Classification Election

_			1	CWID 140: 1949-1918
Deparin Internal	nent of the Treasury Revenue Service	Information about Form 8832 and its instructions is at www.irs.gov/form88	92,	
	Name of eligib	le entity making election		liflogian number
_	Logisticco I	3.V		
Тур	O Number, skee	l, and room or saile no. If a P.O. box, see instructions.		
or	CICI ANGRESI (G)	nd Priv. Eq. Inv., Nieuwe's-Gravelandseweg 17		
Pric		state, and ZIP code. If a foreign addrass, enter city, province or state, postal code and country. Follow ti	ne country's pr	utilice for entering the
	1405 HK Bu	ssum, The Netherlands		
►CI	reck lf: 🔲 Add	ress change	19-41	
	LJ Relie	ef for a late change of entity classification election sought under Revenue Proced	ure 2010-3	2
Parl	Election Election	Information		
1	Type of election	on (see instructions):		
а Ь	☑ initial class ☐ Change in	ification by a newly-formed entity. Skip lines 2a and 2b and go to line 3. current classification. Go to line 2a.		
2a	Has the eligible	e entity previously filed an entity election that had an effective date within the las	60 months	?
	☐ Yes. Go to ☐ No. Skip lin	line 2b. na 2b and go to line 3.		
2b	Was the eligible formation?	e entity's prior election an initial classification election by a newly formed entity t	hat was effe	ctive on the date of
	Yes, Go to	ilne 3. ere. You generally are not currently eligible to make the election (see instructions).	
3	Does the eligib	le entity have more than one owner?		
	Yes. You ca No. You ca to line 4.	n elect to be classified as a partnership or an association taxable as a corporation. n elect to be classified as an association taxable as a corporation or to be disreg	Skip line 4 a	and go to line 5. separate entity. Go
4	If the eligible er	ntity has only one owner, provide the following information:		
a b	Name of owner Identifying num	→ WPEF VI Holding Cooperatief W.A. ther of owner > EIN #98-1251337	1 0 0 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
5	If the eligible er employer identi	ntity is owned by one or more affiliated corporations that file a consolidated retur filication number of the parent corporation:	n, provide t	ne name and
a	Name of parent	i corporation >		
b	Employer Ident	ification number >		
		en a de se possionen en el del hang maldenpol de de des de seguine de seguine de seguine de seguine seguine un se conven un de seguines de		
or Par	nerwork Reductio	nn Aci Malica, ena Instructione		0000

	832 (Rev. 12-2013)				age 2	
Par						
6	Type of entity (see instructions):					
а	☐ A domestic eligible entity electing to be cla	seelfieri se on seennlotion tovol	hio ne	a acrogration		
b	A domestic eligible entity electing to be cis	assified as a pertnership.	op ou	a corporation.		
C	A domestic eligible entity with a single own	ner electing to be disregarded	85 & S	eparate entity.		
d	A foreign eligible entity electing to be class	alfied as an association taxable	a9 a	corporation.		
8	☐ A foreign eligible entity electing to be class	sified as a partnership.				
f	A foreign eligible entity with a single owner	r electing to be disregarded as	a sep	arate entity.		
7	If the eligible entity is created or organized in a foreign jurisdiction, provide the foreign country of organization ▶ Netherlands					
8	Election is to be effective beginning (month, di	ay, year) (see instructions) .	*);	9/20/2010	3	
9	Name and title of contact person whom the IR	S may call for more information	п	10 Contact person's telephone number	r	
	Lauren Keller, Clifford Chance US LLP			212-878-8491		
	Consent Staten	nent and Signature(s) (see	instr			
above	Under penalties of perjury, I (we) declare that I (we) consent to the election of the above-named entity to be classified as indicated above, and that I (we) have examined this election and consent statement, and to the best of my (our) knowledge and belief, this election and consent statement are true, correct, and complete. If I am an officer, manager, or member signing for the entity, I further declare under penalties of perjury that I am authorized to make the election on its behalf.					
	Signatura(s)	Date		Title		
		11/1/16	Direc	tor of Waterland Private Equity		
	/ /		inve	stments B.V. as director of WPEF V Holding		
			Con.	eratief W.A.		
			COOL	retaliei w.m.		
			<u> </u>			
			_			
			_			
			_			
			L			
			_			

Part II Late Election Relief 11 Provide the explanation as to why the entity classification election was not filed on time (see instructions).	Form 8832 (A			Page 3
Under penalties of perjury, I (ws) declare that I (ws) have examined this election, including accompanying documents, and, to the best of my (our) knowledge and bellef, the election contains all the relevant facts relating to the election, and such facts are true, correct, and complete. I (ws) further declare that I (ws) have personal knowledge of the facts and circumstances related to the election. I (ws) further declare that the elements required for rellef in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.	Part II	Late Election Relief		
Under penalties of perjury, I (we) declare that I (we) have examined this election, including accompanying documents, and, to the best of my (our) knowledge and bellef, the election contains all the relevant facts relating to the election, and such facts are true, correct, and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.	11 Pro	vide the explanation as to why the entity c	lassification election was not fil	led on time (see instructions).
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.	NIA			
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.				
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.				
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.				
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.				-
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.				
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.				
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.				
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.				
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.				
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.				
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.				
Signature(s) Date Title	SHICL CURRICH	HJE. I IWAI IUMAR DPCIAM INAT I IWA DAWA N	Greandi kriatijoaas at the taate	and altalization of a salated to the election (first
		Signature(s)	Date	Title
	_			
				<u> </u>

Form **8832**

(Rev. December 2013)

Entity Classification Election

OM8 No. 1548-1516

Department of the Treasury Internal Revenue Service

► Information about Form 8832 and its instructions is at www.irs.gov/form8832.

	Name of eligible entity making election	Employer Identification number
	Powerco B.V.	sessionated transfer of the session
Тур	Number, street, and room or suite no. If a P.O. box, see Instructions.	
O.		
Pri	It City or town, state, and ZiP code, if a foreign address, enter city, provings or state proving code and source.	the second decrease of the second second
	postal code.	me consult a busines for auraitali rua
	1405 HK Bussum, The Netherlands	
►C	neck if: Address change Late classification relief squart under Revenue Procedure 2	009-41
	☐ Hellef for a late change of entity classification election sought under Revenue Provi	odura 2010-22
Par	Election Information	10-02
1	Type of election (see instructions):	
	_	
а	☑ Initial classification by a newly-formed entity. Skip lines 2a and 2b and go to line 3.	
þ	☐ Change in current classification. Go to line 2a.	
_		
2a	Has the eligible entity previously filed an entity election that had an effective date within the la	st 60 months?
	Yes. Go to line 2b,	
	☐ No. Skip line 2b and go to line 3,	
2b	Taller Man (N. M. b.) 164 A. A. A. A. A. A. A. A. A. A. A. A. A.	
ZU	Was the eligible entity's prior election an initial classification election by a newly formed entity formation?	that was effective on the date of
	tottingtorty	
	☐ Yes. Go to line 3.	
	\square No. Stop here. You generally are not currently eligible to make the election (see instruction	s),
3	Does the eligible entity have more than one owner?	
	and alfana array there there were out out to	
	☐ Yes. You can elect to be classified as a partnership or an association taxable as a corporation	Skin line 4 and an 4-11 5
	No. You can elect to be electified as an escentification to the state as a corporation	i. Skip line 4 and go to line 5,
	No. You can elect to be classified as an association taxable as a corporation or to be disre- to-line 4.	garded as a separate entity. Go
	1.72 V	
4	If the sligible entity has only one owner, provide the following information:	
а	Name of owner > WPEF VI Holding Cooperatief W.A.	
b	Identifying number of owner ➤ EIN #98-1251337	
5	If the eligible entity is owned by one or more affiliated corporations that file a consolidated retu	m, provide the name and
	employer identification number of the parent corporation:	· · · · · · · · · · · · · · · · · · ·
_	Name of according to the second secon	
a	Name of parent corporation	
b	Employer Identification number ►	

	882 (HBV, 12-2013)			Page :	
Par					
6	Type of entity (see instructions):				
а	A domestic eligible entity electing to be cla	Assifled as an segociation toyahi	lo se s	compretton	
b	A domestic aligible entity electing to be cle	assified as a partnership.	10 BS G	corporation,	
C	A domestic eligible entity with a single ow	ner electing to be disregarded as	s a ser	parate entity.	
d	A foreign eligible entity electing to be class	sified as an association taxable a	as a co	proration.	
e					
f	A foreign eligible entity with a single owner	r electing to be disregarded as a	a separ	ate entity.	
7	If the eligible entity is created or organized in	- 61 t111-141			
•	organization > Netherlands	a loreign jurisdiction, provide the	e toreiç	in country of	
	Since a quant marker of the light paper of a mark first paper of the paper.	· · · · · · · · · · · · · · · · · · ·	******		
8	Election is to be effective beginning (month, d	ay, year) (see instructions)	000	9/7/2016	
					
9	Name and title of contact person whom the IR	S may call for more information) [O Contact person's telephone number	
	Lauren Keller, Clifford Chance US LLP				
				212-878-8481	
	Consent States	nent and Signature(s) (see i	instru	ctions)	
Undar	penalties of perjury, I (we) declare that I (we) co	present to the election of the ebo	Wa-nar	ned entity to be electified as indicated	
apove,	, and inat I twel have examined this election an	O consent statement, and to the	a heet r	of the four knowledge and ballet this	
erecuo	n and consent statement are true, correct, and e under penalties of perjury that I am authorize	complete if I am an officer mai	TOROGE	or member signing for the entity, I further	
	o and a policinos of policity that that addition to	a to mayo ale election ou its pet.	TELL L		
	\$Ignature(s).	Date		Title	
		44/4.14/		1 tria	
		MMIND	Directo	r of Waterland Private Equity	
	/ /				
			Investo	nents B.V. as director of WPEF V Holding	
			0 -4		
			Cooper	atlef W.A.	
		l			
					
		·			
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Provide the explanation as to why the entity classification election was not filed on time (see instructions).	Part II Late El	ection Relief		Page
Jinder penalties of perjury, I (we) declare that I (we) have examined this election, including accompanying documents, and, to the best of my (our) knowledge and bellef, the election contains all the relevant facts relating to the election, and such facts are true, correct, and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) urther declare that the elements reculred for relief in Section 4.01 of Flevenue Procedure 2009-41 have been satisfied. Signature(s) Date Title Title			classification election was not f	lied on time (see instructions).
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) unther declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied. Signature(s) Date Title	NIA			•
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) unther declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied. Signature(s) Date Title				
and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) unther declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied. Signature(s) Date Title				
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and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) unther declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied. Signature(s) Date Title	·			
Signature(s) Date Title	and complete. I (we) further declare that th	urther declare that I (we) have p e elements required for relief in	ave examined this election, inc ns all the relevant facts relating ersonal knowledge of the facts Section 4.01 of Revenue Proce	luding accompanying documents, and, to the best to the election, and such facts are true, correct, and circumstances related to the election. I (we) edure 2009-41 have been satisfied.
		lignature(s)		
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				· · · · · · · · · · · · · · · · · · ·
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i l				

Entity Classification Election

OMB No. 1545-1516

Deport Interna	ment of the Treasury I Rovenue Service	▶ information about Form 8832 and its instructions is at www.irs.govitorm8	832.			
		le snity making election	Employer Ide	ntification number		
т	SaaSco VI E	J.V.				
Typ		t, and room or sulte no. If a P.O. box, see instructions.				
Pri	MA ANGUELISM	nd Priv. Eq. inv., Nieuwe's-Gravelandseweg 17				
• • •	postal code.	inte, and ZIP code. If a foreign address, enter city, province or state, postal code and country. Follow	the country's pr	actice for entering the		
	1405 HK Bu	ssum, The Netherlands				
►C	heck if: Add	ress change Late classification relief sought under Revenue Procedure 20	200 44			
	Relief for a late change of entity classification election sought under Revenue Procedure 2010-32					
Par	Election	Information	QUID 20 10-3.	<u> </u>		
1	Type of election	on (see instructions):				
	71	NAI of A				
a b	Change in	ffication by a newly-formed entity. Skip lines 2a and 2b and go to line 3. current classification. Go to line 2a.				
2a	Has the eligible	entity previously filed an entity election that had an effective date within the las	st 60 months	?		
	Yes. Go to	line 9h				
		e 2b and go to line 3.				
	— Horompili	e sp and 30 to title 9.				
2b	Was the eligible formation?	e entity's prior election an initial classification election by a newly formed entity	that was effe	ctive on the date of		
	Yes. Go to	la				
	C No. Stop He	ere. You generally are not currently eligible to make the election (see instructions	s).			
3	Does the eligib	e entity have more than one owner?				
	Yes. You ca	n elect to be classified as a partnership or an association taxable as a corporation				
	No. You car	n elect to be classified as an association taxable as a corporation or to be disre	. Skip line 4 :	and go to line 5.		
	to line 4.	. The transfer of the second o	garded as a	separate entity. Go		
4	If the eligible en	tity has only one owner, provide the following information:				
a	Name of owner	► WPEF VI Holding Cooperatief W.A.				
b	Identifying num	ber of owner ▶ EIN #98-1251337		***************************************		
	_	·····································	7 0 5 4 4 5 4 7 F E 6 6 5 4 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5			
,-	***					
5	omployer identi	tily is owned by one or more affiliated corporations that file a consolidated retu fication number of the parent corporation:	rn, provide ti	ne name and		
		·				
a	Name of parent	Corporation >				
þ	Employer identi	ication number				
D						

Form Bl	182 (Rev. 12-2013) Election Information (Continued)				Page 2	
6	Type of entity (see instructions):					
b c d e f	□ A domestic eligible entity electing to be cling to be cling. A domestic eligible entity electing to be cling. A domestic eligible entity with a single ow. A foreign eligible entity electing to be class. A foreign eligible entity electing to be class. A foreign eligible entity with a single owns.	assified as a partnership, ner electing to be disregarded sified as an association taxable sified as a partnership.	88 a s 88 a	eparate entity. corporation.		
7	If the eligible entity is created or organized in a foreign jurisdiction, provide the foreign country of organization ▶ Netherlands					
8	Election is to be affective beginning (month, d	ay, year) (see Instructions) .		, > 2/19/201	6	
9	Name and title of contact person whom the IR	IS may call for more information	n	10 Contact person's telephone number	r	
	Michaela Morr, Clifford Chance US LLP			212-878-8156		
	Consent Staten	nent and Signature(s) (see	Instr			
alectio	penalties of perjury, I (we) declare that I (we) or and that I (we) have examined this election an a and consent statement are true, correct, and under penalties of perjury that I am authorized	d consent statement, and to the	e bes	had was fassed languaged and a word bright star.		
	Signature(s)	Date	<u> </u>	Title		
		9/25/17	Direc	tor of Waterland Private Equity		
	('/		Inves	tments B.V. as director of WPEF Vt Holding	_	
			Собр	eratief W.A.		
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					_	
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					_	
			_			
				Form 8832 (Rev. 12-2	013)	

		v. 12-2013		D-8-F					Page 3
Part				on Relief					
11	Prov	lde the e	xpla	nation as to	why the entity cl	assifica	ition elec	tion was not fi	led on time (see instructions).
SaaSc	VI B	.V. ("Saa	Sco")	was formed	on February 19, 2	016. Al	though S	aaSco intended	d to elect to be treated as a
									bruary 19, 2016, SaaSco inadvertently failed to
<u>file the</u>	IRS F	orm 883:	2 Enti	ty Classifical	tion Election with	n the re	equired 11	ne period. Afte	er discovering this fallure to file the Form 8832,
SaaSco	took	the app	<u>oprja</u>	le sleps to g	ather the necessa	ry infor	mation a	nd prepare and	file the Form 8832 in a manner consistent with its
<u>orlgina</u>	1 inter	tien pur	svant	lo Rev. Prac	:. 2009-41.				
								-	
				_					
Under	penal	ties of p	erjury	, I (we) decl	are that I (we) ha	VO OXE	mined th	s election, incl	luding accompanying documents, and, to the best to the election, and such facts are true, correct,
and co	mple	le. i (we)	furth	er declare ti	nat I (we) have pe	ersonal	knowled	ge of the facts	and circumstances related to the election. I fuel
Ini (i ioi	uecie			ature(s)	nied for tellet ill s	Section	4.U1 OT I		edure 2009-41 have been satisfied.
	/	7		1		al	25	17	
		-{	\nearrow			-	~	117	Director of Waterland Private Equity
_(Investments B.V. as director of WPEF VI Holding
									Cooperatief W.A.
		=							
				<u>.</u>					

Form 8832

Rev. December 2013

Entity Classification Election

OMB No. 1545-1516

Department of the Trees

▶ Information about Form 8832 and its instructions is at www.irs.gov/form8832

1146(1146)	Linksing datales	iletroctore is at www.ire.gov/roma		
	Name of aligible entity making election		Employer Ida	ntification number
Тур	Textilesco B.V. Number, street, and room or selte no. If a P.O. box, see instructions.			
191				
Pri	CIO VERICIALIO FITO. E.G. 1110., INCLURE S-GIAVEININGSEWED 17			
7 140	11 City or town, state, and ZIP code. If a foreign address, enter city, province postal code.	or state, postal code and country. Follow	the country's p	actice for entering the
	i			
N.C	1405 HK Bussum, The Netherlands neck if: ☐ Address change ☐ Late classification reliaf so			
P-0		ight under Revenue Procedure 2	009-41	
Par	Relief for a late change of entity classification elect Election information	tion sought under Revenue Proce	dure 2010-3	2
	TISOTION WHO I III STORIE			
1	Type of election (see instructions):			
_	[7]) [6]) A 400 A 40			
a b	☑ initial classification by a newly-formed entity. Skip lines 2	a and 2b and go to line 3.		
D	Change in current classification. Go to line 2a.			
28	Has the eligible entity previously filed an entity election that h	ad an effective date within the la	st 60 months	9
	Yes, Go to line 2b.			
	No. Skip line 2b and go to line 3.			
2b	A CONTRACTOR OF THE PROPERTY O	election by a newly formed entity	that was effe	ective on the date of
	formation?			
	TV 0-4-15-4			
	Yes, Go to line 3.			
	☐ No. Stop here. You generally are not currently eligible to r	nake the election (see instruction	s).	
3	Does the eligible entity have more than one owner?			
	Yes. You can elect to be classifled as a partnership or an as	SSOCIATION taxable as a corneration	Skin line 4	and an to line 5
	No. You can elect to be classified as an association taxable line 4	ale se a compretion or to be dis-	is orth illie 4	and go to little o.
	to line 4.	ve as a corporation or to be diste	garoed as a	separate entity, Go
4	if the eligible entity has only one owner, provide the following	information:		
8	Name of owner > WPEF VI Holding Cooperate! W.A.			
b	Identifying number of owner ► EIN #98-1251337			
5	(f Alaman Hallandan Anna Carana and Anna Anna Anna Anna Anna Anna An			
0	If the eligible entity is owned by one or more affiliated corpora	ations that file a consolidated retu	ım, provide t	he name and
	employer identification number of the parent corporation:			
а	Name of parent corporation ▶			
ь	Employer identification number >	200 20 km ny mpoz 00 20 miron pry vy 0002 dára běla na pry pygy		
~	Employer Identification number ►			
or Pay	perwork Reduction Act Notice, see instructions.	Cat. No. 22598R	Fi	orm 8832 (Rev. 12-2013)

	132 (Flev. 12-2013)			P	aga 2
Part					-
8	Type of entity (see instructions):				
a b	☐ A domestic eligible entity slecting to be clic ☐ A domestic eligible entity electing to be clic	assified as an association taxal	ble as	a corporation.	
C	A domestic eligible entity with a single own	assued as a partnership. her electing to be discoverded :	20 2 2	operate antity	
ď	☐ A foreign eligible entity electing to be class	itiad as an essociation taxable	49 Q Q	eparate bitury. Corporation	
e	☐ A foreign eligible entity electing to be class	sified as a partnership.	43 A	on poration.	
f	☑ A foreign eligible entity with a single owner	r electing to be disregarded as	a sed	arate entity.	
		-	•	•	
7	If the eligible entity is created or organized in a organization ► Netherlands	a foreign jurisdiction, provide th	ne fore	algn country of	
8	Election is to be effective beginning (month, d	ay, year) (see instructions) .	• •	▶10/12/201	ß
9	Name and title of contact person whom the IR	S may call for more information	n	10 Contact person's telephone number	r
	Lauren Keller, Clifford Chance US LLP			212-878-6481	
	Consent States	nent and Signature(s) (see	inst		_
electio	penalties of perjury, I (we) declare that I (we) co and that I (we) have examined this election and and consent statement are true, correct, and a under penalties of perjury that I am authorized	onsent to the election of the ab	ove-n e bes	amed entity to be classified as indicated	
	Sjanature(s)	Date		Title	
		MM16	Direc	tor of Waterland Private Equity	
	/1/		Inves	iments B.V. as director of WPEF V Holding	
			Сойи	eratlef W.A.	
				2,2,000	
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Pai	Late Election Relief		Page 5
11	Provide the explanation as to why the entity	classification election was not f	iled on time (see instructions).
N/A			
_			
	omplete. I (we) further declare that I (we) have r declare that the elements required for relief i		luding accompanying documents, and, to the best to the election, and such facts are true, correct, a and circumstances related to the election. I (we) edure 2009-41 have been satisfied.
	Signature(s)	Date	Title
		_	
			1

Form 8832

Rev. December 2013

Entity Classification Election

OMB No. 1545-1516

Department of the Treasury Internal Revenue Service

▶ Information about Form 8832 and its instructions is at www.irs.gov/form8832.

Charten L	THEY SHATE SHATES	
		Employer Identification number
	WPEF VI Holdco VI BE B.V.	
Тур		
OT	the state (drie f 114; Eq. III4., File late 3-c) be a large state of 12	
Prin	he country's practice for entering the	
	postal code.	
	1405 HK Bussum, The Netherlands	
► Ch	neck if: 🔲 Address change 🔃 Late classification relief sought under Revenue Procedure 200	
	☐ Relief for a late change of entity classification election sought under Revenue Proced	lure 2010-32
- Part	L Election Information	
1	Type of election (see instructions):	
a b	☑ Initial classification by a newly-formed entity. Skip lines 2a and 2b and go to line 3. ☐ Change in current classification. Go to line 2a.	
2a	Has the eligible entity previously filed an entity election that had an effective date within the last	t 60 months?
	☐ Yes, Go to line 2b. ☐ No. Skip line 2b and go to line 3.	
2b	Was the eligible entity's prior election an initial classification election by a newly formed entity to formation?	hat was effective on the date of
	☐ Yes. Go to line 3. ☐ No. Stop here. You generally are not currently eligible to make the election (see instructions	3).
3	Does the eligible entity have more than one owner?	
	Yes. You can elect to be classified as a partnership or an association taxable as a corporation	. Skip line 4 and go to line 5.
	No. You can elect to be classified as an association taxable as a corporation or to be disret to line 4.	
4	If the eligible entity has only one owner, provide the following information:	
8	Name of owner ► WPEF VI Holding Cooperation W.A.	
b	Identifying number of owner ► EIN #98-1251337	
2	tempiter I til i tempire och gering in. men und sam sam sam sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i sam sam i	
5	If the eligible entity is owned by one or more affiliated corporations that file a consolidated retu employer identification number of the parent corporation;	rn, provide the name and
ā	Name of parent corporation >	
b	Employer Identification number >	رد شدک در سرم در چرچه به گرد کرد. این این این میشود به این به این به این به این به این به این به این به این به

Form 8	832 (Rev. 12-2013)			n n	age :
Par	The state of the s			F	rge /
6	Type of entity (see instructions):				
8	A domestic eligible entity electing to be c	lassified as an essociation tax	rahle as	8 cornection	
þ	A domestic eligible entity electing to be c	lassified as a parinershin			
d		ner electing to be disregarded	d as a s	eparate entity.	
e	☐ A foreign eligible entity electing to be clas ☐ A foreign eligible entity electing to be clas	sitied as an association taxab	de as a	corporation.	
f	A foreign eligible entity with a single owner	isilieu as a partnership. Ir election to be dicrogardod o	e e eer	state ontibu	
7	If the eligible entity is created or organized in organization ➤ Netherlands	a foreign jurisdiction, provide	the fore	olgn country of	
8	Election is to be effective beginning (month, o	lay, year) (see instructions) .		<u>1/12/2017</u>	,
9	Name and title of contact person whom the if	RS may call for more informati	on	10 Contact person's telephone number	1
	Caroline Phillips, Clifford Chance US LLP			212-870-8121	
	Consent States	ment and Signature(s) (se	e instr		
electio	penalties of perjury, I (we) declare that I (we) or and that I (we) have examined this election an n and consent statement are true, correct, and a under penalties of perjury that I am authorize	complete If Lam on officer	the besi		er
	Signature(s)	Date		Title	_
		5/22/17	B.T. E	lema, Director of Waterland Private Equity	
	1 /		inves	Iments B.V. as director of WPEF V Holding	
			Соёр	pratief W.A.	
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Form 8BS2 (Rev. 12-2013)		Page \$
Part II Late Election Relief		
11 Provide the explanation as to why the entity cl		
WPEF VI Holdco VI BE B.V. ("WPEF") was formed on Jan	uary 12, 2017. Although WPEF	intended to elect to be treated as a
disregarded entity for U.S. federal income tax purposes i	eginning as of formation on Ja	nuary 12, 2017, WPEF inadvertently failed to
file the IRS Form 8832 Entity Classification Election with	n the required time period. Afte	r discovering this failure to file the Form 8832.
WPEF took the appropriate steps to gather the necessary	/ Information and prepare and fi	le the Form 8632 in a manner consistent with its
original intention pursuant to Rev. Proc. 2009-41,	· · · · · · · · · · · · · · · · · · ·	
Under penalties of perjury, I (we) declare that I (we) ha of my (our) knowledge and belief, the election contains and complete. I (we) further declare that I (we) have perfurther declare that the elements required for relief in S	s all the relevant facts relating ersonal knowledge of the facts	to the election, and such facts are true, correct,
Signature(s)	Date	Title
1	5/22/17	B.T. Elema, Director of Waterland Private Equity
		Investments B.V. as director of WPEF V Holding
		Cooperatief W.A.
	<u> </u>	

Form **8865**

Department of the Treasury Internal Revenue Service

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

Attach to your tax return.

Go to www.krs.gov/Form8865 for instructions and the latest information. Information furnished for the foreign partnership's tax year inning January 1, 2017, and ending December 31, 20

Filer's identifying number

OMB No. 1545-1668

Attachment Sequence No. 118

17

Name of person filing this return						Ī	Filer's Identifying number						
Boy Scouts of America										22-1576	300		
Filer's ad	idress (if you are not	filing this form with	your tax retu	rn)	A Cater		r (see Categ	ories o		the Instru	ctions and	check ap	pplicable box(es))
					B Filer's	tax year	beginning		, 20	, a	nd ending		. 20
	iler's share of liab						ourse finan				e Other 8	3	None
D H	filer is a member	of a consolidated	d group but	not the paren	t, enter th	e follow	ng informa	tion at	out the	parent:			
_	lame						Eli	N					
	ddress												
E C	heck if any excep	ted specified for	eign financia	al assets are re	eported o	n this fo	rm (see ins	tructio	ns) .				<u> </u>
F Ir	nformation about	certain other part	iners (see in	structions)						1 4			
	(1) Name			(2) Addres	59		(3) Ident	lifylng n	umber		Check a		
										Catego	ry 1 Ga	tegory 2	Constructive owne
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							+				_	-	ļ
G1 N	lame and address	of foreign post-			 .		Diel CINI	66 3					L
W. 14	IGILIE BLIO SOCIESS	or loreign partne	staulb				2(a) EIN	(ii any)	,	00.440	7000		
	Asia VI, L.P.						2/b) Refe	978500	ID mussi	98-116 ber (see i			
c/o Orci	hid Asia V Group	Management, L	.td.				Z(D) Neit	BICITOS	(D FIGHT	nei (see ii	i i au . j		
	3211-12, The Center en's Road Centra						3 Countr	ry unde	er whose	a laws ord	nanized		
HK	THE KONG CENTE	•					CI	· y - 0.1101	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	2 100 0112	JOH 1122-04		
	ate of	5 Principal plac		Principal busir		7 Pri	ncipal busir	ness	8a Fun	ctional ct	Jrrency	8b Exc	hange rate
0	rganization	business		activity code r	number	act	ivity				-		e instr.)
	08/20/2014	HK		523900		Invest	ments		USD			i	
	rovide the following												
	lame, address, an Inited States	d identifying nurr	nber of agen	t (If eny) in the	•	2 0	heck if the	foreig	n partne	rship mu			
U	mileo States						Form 10		Form				г 1065-В
						1 8	iervice Cente	er when	9 Form 10	085 or 106	5-B is filed	i:	
N/A 3 N		-6.6		4.5.			ogden, UT						
	lame and address rganization, if any		ersnip:s agei	nt in country o	OT .	r	ame and a cords of the nd records	he fore	ign parti	on(s) with nership, a	n custody and the lo	of the b cation o	ooks and of such books
	Asia VI, L.P.							,	-10.50				
c/o Orch	hid Asia V Group 211-12, The Cen	Management, L	.td. Bood Contr	-I- III/									
	Were any special				n2	San	<u> </u>					□ v.	
	Enter the number				-								is VI No
	attached to this re	turn (see instruct	tions)	I Heturn or U	.s. Perso	ns yyıtı	Respect	io ron	eign Dis	sregarded	Entities,		
7	How is this partne	rship classified u	inder the lav	v of the count	ry in whici	h it is or	nanized?		Limite	 d Partner	ship		
8a	Does the filer have unit under Reg. 1.1	an interest in the f	foreign partne	ership, or an in	terest Indii	ectly thr	ough the for	relan pi	artnershi	p. that is a	separate		
ЬΙ	If "Yes," does the s	eparate unit or cor	nbined sepai	ate unit have a	dual cons	olidated	loss as defi	ned in I	Reg. 1.1	503(d)-1(h	M51/03. ►		s DNo
	Does this partners										*******		- Ind 196
(The partnership 	s total receipts fo	or the tax ye	ar were less ti	han \$250,	600 and	I		1				
ı	 The value of the if "Yes," do not co 	parinership's tot omplete Schedul	tal assets at es L. M-1, a	the end of the	tax year	was les	s than \$1 m	nillion.	}	• • •	>	☐ Ye	s 📝 No
Sign Here	Under pena	ities of perium. I de	clare that I ha	ve evernined th	ls return, in	cluding a	ccompanyin	g sched	fules and	statement	ts, and to 1	he best o	f my knowledge
Only If Yo Are Filing This Form Separately	information	t is true, correct, an of which preparer i	ic compiete, i	Jecieration of Di	reparer (oth	ier than g	eneral partni	er or lin	ilted liabi	lity compa	ny mambe	r) is baser	d on all
and Not W	Vith							1	k				
Return.		ure of general partn	er or limited I	ability company	mamber /				Da	ate			
Paid	Print/Type p	reparer's name		Preparer's si	gnature				Date		Check C] _K PT	IN
Prepa			. <u>.</u>								self-emplo		
Use O	nly Firm's name										Firm's EIN	_	
	Firm's addre	188 >			_						Phone no.		

Form	8865 (20	117)				Page 2
Sch	edule			ying number (if any) of the person	vou checi
		Name	Address	Owns a constructive	Check If	Check if direct partner
Sch	edule	A- Certain Partners of Foreign	n Partnership (see instructions)			<u>'</u>
		Name	Address	Identifying num	ber (if any)	Check if foreign person
_						
	· ·					
Does	the pa	artnership have any other foreign perso	n as a direct partner?		☐ Yes	No
Sch	edule	Affiliation Schedule. List a direct interest or indirectly or	ll partnerships (foreign or dome wns a 10% interest.	stic) in which the for	reign partnersh	nip owns a
		Name	Address	EIN (if any)	Total ordinary income or loss	Check if foreign partnership
						
\equiv			-			
	edule		or Business Income			
Cauti	ion: Inc	clude only trade or business income and	expenses on lines 1a through 22 belo	w. See the instructions		tion.
	1.	S				
		Gross receipts or sales Less returns and allowances				
	2	Cost of goods sold		97. 49	10	
e	3	Gross profit. Subtract line 2 from line			3	
ncome	4	Ordinary income (loss) from other part	inerships, estates, and trusts (attack	h statement)	4	
Ĕ	5	Net farm profit (loss) (attach Schedule	F (Form 1040))	10 N N N N N N N	5	
	6	Net gain (loss) from Form 4797, Part II	, line 17 (attach Form 4797)	1 18 18 1 1 1	6	<u> </u>
	7	Other income (loss) (attach statement)			7	
	8	Total income (loss). Combine lines 3	through 7		8	
	9	Salaries and wages (other than to part	ners) (less employment credits) .		9	
SIIC)	11	Guaranteed payments to partners Repairs and maintenance		* * * * *	10	
iter	12	Bad debts			11	
튼	13	Rent		38 38 (8) (8)	12	
5	14	Taxes and licenses		3. 3. 3. 3. 5. 4. 5.	14	
퉏	15	Interest		15 12 15	15	
Str.	16a	Depreciation (if required, attach Form	4562)	i wamai .		
훈	ь	Less depreciation reported elsewhere	on return 16b		16c	
98)	17	Depletion (Do not deduct oil and gas	depletion.)	### W W 2	17	
Suc	18	Retirement plans, etc	9	* * * *	18	
¥	19	Employee benefit programs	3 - 3 - 3 3 6 - 3 -	12 (0 33 to 1 2)	19	
Deductions (see instructions for limitations)	20	Other deductions (attach statement)		********	20	
	21	Total deductions. Add the amounts s	shown in the far right column for line	es 9 through 20	21	

Ordinary business income (loss) from trade or business activities. Subtract line 21 from line 8

22

Form 8665	5 (2017)		One	ge 3
Sched	ule K	Partners' Distributive Share Items	Total amount	800
	1	Ordinary business income (loss) (page 2, line 22)	1	
	2	Net rental real estate income (loss) (attach Form 8825) . 🛒 😭 🐰	2	
	3a	Other gross rental income (loss)		
	b	Expenses from other rental activities (attach statement) 3b		
	C	Other net rental income (loss). Subtract line 3b from line 3a	3c	
9	4	Guaranteed payments	4	
ŏ	5	Interest income	5	
=	6	Dividends: a Ordinary dividends	6a	_
ncome (Loss)		b Qualified dividends 6b	AT S	_
8	7	Royalties	7	
<u>E</u>	8	Net short-term capital gain (loss) (attach Schedule D (Form 1065))	8	
	9a	Net long-term capital gain (loss) (attach Schedule D (Form 1065))	9a	
	b	Collectibles (28%) gain (loss)	500	
	C	Unrecaptured section 1250 gain (attach statement) 9c		
	10	Net section 1231 gain (loss) (attach Form 4797)	10	
	11	Other income (loss) (see instructions) Type ▶	11	_
28	12	Section 179 deduction (attach Form 4562)	12	_
<u> </u>	13a	Contributions	13a	_
Ö	b	Investment Interest expense	13b	
Deductions	C	Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶	136(2)	_
	d	Section 59(e)(2) expenditures: (1) Type ► (2) Amount ► Other deductions (see instructions) Type ►	13d	
Self- Employ- ment	14a	Net earnings (loss) from self-employment	14a	
Self- mploy ment	b	Gross farming or fishing income	14b	_
<u> </u>	С	Gross nonfarm income	14c	_
	15a	Low-income housing credit (section 42(I)(5))	15a	
ø,	ь		15b	_
Ë	С	Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)	15c	_
Credits	d	Other rental real estate credits (see instructions) Type	15d	-
0	e	Other rental credits (see instructions) Type ▶	15e	_
	f	Other credits (see instructions) Type ▶	15f	_
	16a	Name of country or U.S. possession ▶		
én	ь	Gross income from all sources	16b	
Transactions	C	Gross income sourced at partner level	16c	
*		Foreign gross Income sourced at partnership level	And the second	_
8	d	Passive category ► e General category ► f Other (attach statement) ►	16f	
뎚		Deductions allocated and apportioned at partner level		
F	g	Interest expense h Other	16h	
E E		Deductions allocated and apportioned at partnership level to foreign source income		_
Forei	ı	Passive category ► I General category ► k Other (attach statement) ►	16k	
윤	1	Total foreign taxes (check one); ▶ ☐ Paid ☐ Accrued	161	
	m	Reduction in taxes available for credit (attach statement)	16m	
		Other foreign tax information (attach statement)		
Alternative Minimum Tax (AMT) Items	17a	Post-1986 depreciation adjustment	17a	
Alternative linimum Ta AMT) Items	b	Adjusted gain or loss	17b	
E 5 5	C	Depletion (other than oil and gas)	17c	_
흌듇돌	d	Oll, gas, and geothermal properties—gross income	17d	
ৰ <u>ই</u> হ	6	Oll, gas, and geothermal properties—deductions.	17e	_
	19a	Other AMT items (attach statement)	17f	_
Other Information		Tax-exempt interest income	18a	_
<u> </u>	b	Other tax-exempt income ,	18b	
Εl		Nondeductible expenses	18c	_
6	19a b	Distributions of cash and marketable securities	19a	_
늗	_	Distributions of other property	19b	
Ē	20a b	Investment expenses	20a	
ಕ	_	Investment expenses	20b	क्रम
	- 6	Other Items and amounts (attach statement)	The state of the s	

Sche	Schedule L Balance Sheets per Books. (Not required if Item H9, page 1, is answered "Yes.")								
		Beginning	of tax year	End of	tax year				
	Assets	(3)	(b)	(c)	(d)				
1	Cash	Assessment of the second							
2a	Trade notes and accounts receivable				And the same of th				
b	Less allowance for bad debts								
3	Inventories			3.2.2					
4	U.S. government obligations	The same of							
5	Tax-exempt securities	a was a wall to be a second							
6	Other current assets (attach statement)	At Same							
7a	Loans to partners (or persons related to	A TANK OF THE PARTY OF THE PART							
	partners)								
b	Mortgage and real estate loans								
8	Other investments (attach statement)	A 22 - 30 (-)							
9a	Buildings and other depreciable assets								
b	Less accumulated depreciation								
10a	Depletable assets								
b	Less accumulated depletion								
11	Land (net of any amortization)								
12a	Intangible assets (amortizable only)								
b	Less accumulated amortization								
13	Other assets (attach statement)								
14	Total assets								
	Liabilities and Capital		ALC: CANADA						
15	Accounts payable								
16	Mortgages, notes, bonds payable in less than 1 year								
17	Other current liabilities (attach statement) .	图"扩大"。							
18	All nonrecourse loans								
19a	Loans from partners (or persons related to partners)								
b	Mortgages, notes, bonds payable in 1 year or more				`				
20	Other liabilities (attach statement)								
21	Partners' capital accounts								
22	Total liabilities and capital								

Form **8865** (2017)

Sche	edule M Balance Sheets fo	r Interest Allocation		····	Page
OCIT	Balance Sheets 10	r interest Allocation			
				(a)	(b)
				Beginning of	End of
	T			tax year	tax year
1	Total U.S. assets				
2	Total foreign assets:				
а	Passive category	8 8 8 8 8 6 1669			
b	General category	90 W W W W TO COURS	v v	.	
C	Other (attach statement)				
Sch	edule M-1 Reconciliation of Inc	ome (Loss) per Books	With t	ncome (Loss) per Return. (Not requ	ired if Item H9, page 1, is
	answered "Yes.")				
	Mad Inc. of A. A. A. A.		6	Income recorded on books this	
1	Net income (loss) per books .		4	year not included on Schedule K,	
2	income included on Schedule K,			lines 1 through 11 (itemize):	1
	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,		а	Tax-exempt interest \$	1
	and 11 not recorded on books		1		L
	this year (itemize):		7	Deductions included on Schedule	
3	Guaranteed payments (other		1	K, lines 1 through 13d, and 16l not	
	than health insurance)			charged against book income this	1 1
4	Expenses recorded on books		1	vear (itemize):	
	this year not included on		а		
	Schedule K, lines 1 through				1
	13d, and 16l (itemize):				1
а	Depreciation \$				
Ь	Travel and entertainment \$		8	Add lines 6 and 7	
			9	Income (loss). Subtract line 8	
5			1	from line 5	1 1
Sch	edule M-2 Analysis of Partne	rs' Capital Accounts	(Not	required if Item H9, page 1, is an	swered "Yes."
1	Balance at beginning of year		6	Distributions: a Cash	
2	Capital contributed:		1	b Property	
	a Cash		7	Other decreases (itemize):	
	b Property . ,		1		
3	Net income (loss) per books .		1	~ E 00 000	
4	Other increases (itemize):		1		
			8	Add lines 6 and 7	
	**************************************		9	Balance at end of year. Subtract	
5	Add lines 1 through 4		•	line 8 from line 5 ,	
				mic a namento	Form 8865 (2017)
					FOID COOL (2017)

Schedule N Transactions Between Controlled Foreign Partnership and Partners or Other Related Entities

Important: Complete a separate Form 8865 and Schedule N for each controlled foreign partnership. Enter the totals for each type of transaction that occurred between the foreign partnership and the persons listed in columns (a) through (d).

	Transections of foreign partnership	(a) U.S. person Ming this return	(b) Any domestic corporation or partnership controlling or controlled by the U.S. person filing this return	(c) Any other foreign corporation or partnership controlling or controlled by the U.S. person filling this return	(d) Any U.S. person with a 10% or more direct interest in the controlled foreign partnership (other than the U.S. person filing this return)
1	Sales of inventory				
2	Sales of property rights (patents, trademarks, etc.)				
3	Compensation received for technical, managerial, engineering, construction, or like services				
4 5	Commissions received . Rents, royalties, and license				
•	fees received				
6 7	Distributions received Interest received				
,					
8	Other				
9	Add lines 1 through 8	· ·			
10	Purchases of inventory .				
11	Purchases of tangible property other than inventory				
12	Purchases of property rights (patents, trademarks, etc.)				
13	Compensation paid for technical, managerial, engineering, construction, or like services				
14	Commissions paid				
15	Rents, royalties, and license fees paid				
16	Distributions pald .				
17	Interest paid				
18	Other				
19	Add lines 10 through 18 .				
20	Amounts borrowed (enter the maximum loan balance during the year). See instructions				
21	Amounts loaned (enter the maximum loan balance during the year). See instructions				Form 8865 (2017)

SCHEDULE O (Form 8865)

Transfer of Property to a Foreign Partnership (under section 6038B)

Department of the Treasury Internal Revenue Service

➤ Attach to Form 8865. See Instructions for Form 8865.

➤ Go to www.irs.gov/Form8865 for instructions and the latest information.

OMB No. 1545-1688

Name of transferor Filer's identifying number								Imber
Boy Scouts of America 22-1576300								
Name of foreign partnership Orchid Asia VI, L.P. 98-1157099							Reference ID number	ar (see instructions)
90-110/003								
1.721(c)-1T(b)(14)? See Instructions								Yes No
time thereaft	er, a platform	ontribution a	s defined in Reg	ulations se	ction 1.4	82-7(c)(1)?	· · · · · · · · · · · · · · · · · · ·	Yes No
Part I Transfe	ers Reportab	le Under Sect	ion 6038B					
Type of property	(a) Date of transfe	of Number er transi	ferred on date	(c) erket value e of transfer	'	(d) t or other basis	(c) Section 704(c) allocation method	(f) Gain recognized on transfer
Cash	Variou	us NOS	7797	871,339	-		APPENDENT OF MALEY	
Stock, notes receivable	е —							
and payable, and othe securities	r				 			<u> </u>
								
Inventory								
Tangible								
property								
used in trade or business								
Index - the c		-+-					<u></u>	
intangible property								
described in section 197(f)(9)								
======================================								
intangible property, other than intangible								
property described in		- - -						
section 197(f)(9)								
Other property								
p (, -)								
Totals	14255	At the bareau sign	Control of the Contro	-		P		
3 Enter the tran	sferor's perce	entage interest	in the partnersh	ip: (a) Befo	re the tra	nsfer 0,339		transfer 0,3220 %
Supplemental Infor	mation Requ	iired To Be Re	ported (see ins	tructions):				
								
Part II Disposi	lions Report	able Under Se	ction 6038B					
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Mazner of disposition	Gain rec by partr	ognized	(f) Depreciation recapture recognized by partnershi	Gain allocated to partner	(h) Depreciation recapture allocated to partner
				-				-
				1				-
Part III Is any to section to	Part III Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)?							

(Rev. December 2017) 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

Part							
Name	f transferor	Ider	ntifying number (see instructions)				
Boy S	couts of America		22-1576300				
1	If the transferor was a corporation, complete questions 1a th	9.1					
a	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				
a	Did the transferor remain in existence after the transfer?		· · · · Tyes 🗌 No				
	If not, list the controlling shareholder(s) and their identifying r	umber(s).					
	Controlling shareholder	Identify	ing number				
			<u> </u>				
C	If the transferor was a member of an affiliated group fill corporation?	ng a consolidated return, was	s it the parent				
	If not, list the name and employer identification number (EIN)	of the parent corporation.					
	Name of parent corporation	EIN of nove					
	Name of parent corporation	EIN of pare	ent corporation				
	Name of parent corporation	EIN of pare	ent corporation				
		·	•				
d	Name of parent corporation Have basis adjustments under section 367(a)(5) been made?	·	•				
_	Have basis adjustments under section 367(a)(5) been made?		Yes No				
d 2	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the		Yes No				
_	Have basis adjustments under section 367(a)(5) been made?		Yes No				
2	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership.	actual transferor (but is not tr	Yes No reated as such under section 367),				
2	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d.	actual transferor (but is not tr	Yes No				
2 a	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership. Name of partnership	actual transferor (but is not tr	Yes No reated as such under section 367),				
2 a Wateri	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V.	actual transferor (but is not tr	Yes No reated as such under section 367), partnership				
2 a Waterl	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rata share of gain on the trans	actual transferor (but is not tr	eated as such under section 367), partnership oreign				
a Waterl b c	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its entire interest in the partnershi	er of partnership assets?	reated as such under section 367), partnership preign Yes No Yes No				
2 a Waterl	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its entire interest in the partnership is the partner disposing of an interest in a limited partners	er of partnership assets?	reated as such under section 367), partnership preign Yes No Yes No an established				
2 a Waterl	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EiN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its entire interest in the partnershi is the partner disposing of an interest in a limited partners securities market?	er of partnership assets?	reated as such under section 367), partnership preign Yes No Yes No an established				
a Waterl b c	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EiN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its entire interest in the partnershi is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see	EIN of p For of partnership assets? or? hip that is regularly traded on e instructions)	reated as such under section 367), coartnership coreign Yes No Yes No an established Yes No				
Waterlb c d	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EiN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its entire interest in the partnershi is the partner disposing of an interest in a limited partners securities market?	EIN of p For of partnership assets? or? hip that is regularly traded on e instructions)	reated as such under section 367), partnership preign Yes No an established Yes No aldentifying number, if any				
Waterlb c d	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its entire interest in the partnershi is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation)	EIN of p From the second seco	reated as such under section 367), coartnership coreign Yes No Yes No an established Yes No an established Yes No an established Yes No				
Waterlb c d Parti 3 Combo	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rate share of gain on the trans is the partner disposing of its entire interest in the partnershi is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation)	EIN of per of partnership assets? o? hip that is regularly traded on e instructions)	reated as such under section 367), partnership preign Yes No an established Yes No aldentifying number, if any				
Waterlb c d d Part 3 Combe 5	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its entire interest in the partnershi is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) and Group B.V. Address (Including country)	EIN of per of partnership assets? or of partnership assets? inip that is regularly traded on e instructions) 48	eated as such under section 367), partnership preign Yes No Yes No an established Yes No an established Yes No a Identifying number, if any Foreign Reference ID number				
2 a Waterl b c d Part 3 Combo	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its entire interest in the partnershi is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) all Group B.V. Address (including country)	EIN of per of partnership assets? or of partnership assets? inip that is regularly traded on e instructions) 48	eated as such under section 367), partnership preign Yes No an established Yes No aldentifying number, if any Foreign Reference ID number se instructions)				
Waterl b c d Part 3 Combo	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its entire interest in the partnershi is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) all Group B.V. Address (including country) a's-Gravelandseweg 17, 1405 HK Bussum, the Netherlands Country code of country of incorporation or organization (see	EIN of per of partnership assets? or of partnership assets? inip that is regularly traded on e instructions) 48	eated as such under section 367), partnership preign Yes No an established Yes No aldentifying number, if any Foreign Reference ID number se instructions)				
Waterl b c d Part 3 Combe 5 Nieuw 6 NL 7	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its entire interest in the partnershi is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) all Group B.V. Address (including country) B's-Gravelandseweg 17, 1405 HK Bussum, the Netherlands Country code of country of incorporation or organization (see Foreign law characterization (see instructions)	EIN of per of partnership assets? or of partnership assets? inip that is regularly traded on e instructions) 48	eated as such under section 367), partnership preign Yes No an established Yes No aldentifying number, if any Foreign Reference ID number se instructions)				
Waterl b c d Part 3 Combe 5 Nieuw 6 NL 7	Have basis adjustments under section 367(a)(5) been made? If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership. Name of partnership and Private Equity Fund V C.V. Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its entire interest in the partnershi is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) all Group B.V. Address (including country) a's-Gravelandseweg 17, 1405 HK Bussum, the Netherlands Country code of country of incorporation or organization (see	EIN of p For of partnership assets? or	reated as such under section 367), partnership preign Yes No Yes No an established Yes No an established Yes No a Identifying number, if any Foreign Pereign Reference ID number se instructions) COMIZ017				

Form 926 (Rev. 12-20)	*				Page 2
Part III Info	rmation Regarding	Transfer of Property	(see instructions)		
Section A—Ca	sh, Stock, and Secu	rities			
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	Various	DATE AND A SECOND	109,846		
Stock and securities (other than those that qualify as eligible property under Regs. sec. 1.367(a)-2(b)(3))					
If "Yes," si 10 Did the tra recognition	agreement was filed?	rt ill and go to Part IV. r securities subject to se	ection 367(a) with respe		. Yes No
Section B-Prop	erty qualifying for Act	ive Trade or Business	exception under Regs	. sec. 1.367(a)-2(a)(2)(i)	and (ii)
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*
Tangible property					4 41110045
(not listed under another category)					
anouner category)					
Working Interest in					
oll and gas property					
(as described in Regs. sec.					
1.367(a)-2(b)(2)	<u> </u>				
and (f))					
Einenstell egget to					
Financial asset (as described in Regs.					
sec. 1.367(a)-					<u> </u>
2(b)(3))					
Certain tangible					
property to be					
leased (see Regs. sec. 1.367(a)-2(e))					
acc. 1.00((2)-5(6))					

* If properly listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

Totals

1 011H 010 U10V. 12-20								P	age)
Section C—Proj 367(d))	perty not qualif	ying for	Active Trade or Bus	iness except	ion (other 1	than inte	angible prope	erty subject to secti	on
Type of property	(a) Date of transfer		(b) Description of property	Fair mark	c) et value on transfer	C	(d) ost or other basis	(e) Gain recognized or transfer*	n
Inventory									_
Installment								-	
obligations, etc. (as						 			_
described in Regs.									_
sec. 1.367(a)-									
2(c)(2))				 				_	_
Nonfunctional						1			
currency, etc. (as									_
described in Regs.						 			
sec. 1.367(a)- 2(c)(3))									_
2(0)(0))									
Certain leased									
tangible property									
(as described in Regs, sec.									
1.367(a)-2(c)(4))									
Certain property									
to be retransferred									
(see Regs. sec.									
1.367(a)-2(g))									
Provide to the state of									
Property described in Regs. sec.				-					
1.603BB-1(c)(4)(iv)				-					
Property described									
in Regs. sec.				 					_
1.6038B-1(c)(4)(vii)						_			-
Totals		1,3	A verall trans						_
* If property listed in	this section is su	blect to d	iepreciation recapture or	branch loss re	capture, see	instructio	ns.		
17 Did the tra	nsferor transfer	assets t	hat qualify for the trac	le or business	exception	under se	ection 367(a)(3	3)?	0
12 Indicate w	hether the trans	sferor w	as required to recogn	ize income u	nder final a	nd Temi	porary Regula	ations	
sections 1.	.367(a)-2 throug	h 1.367	(a)-7 for any of the folk	owing.		-	, ,		
a Transfer of	i property subjec	ot to sec	ction 367(a)(1) gain rec	ognition. 🕞	36 30 · ·	(6)0)	(V = 12)	Yes 🔲 Ne	0
	on recapture .				<u>*</u>	10000	00.00	Yes 🗌 N	0
c Branch los	s recapture (see	Instruc	tions)		<u>*</u>	(9)	9 3 B 8	💥 🖟 🔲 Yes 🔲 No	٥
e Anv other i	rer to 120 is "Ye	s," ente	r the amount of foreign	n branch loss	recapture >	<u>`</u> .\$			
If the answ	income recogniti ior to line 12e, 1	oh toe	rision contained in the , or 12e is "Yes," see	above-retere	ncea regula	ations .		Yes No	D
the Supple	mental Part III ir	zo, izu iformati	on Required To Be Re	instructions to	or informatic n below	on that n	nust be includ	led in	
Section D-Intar	igible property	under I	Regs. sec. 1.367(a)-1	<u> </u>	II Delow.				_
Type of					7.0			m	_
property	(s) Date of transfer		(b) Description of	(c) Useful	(d) Arm's length	price	(e) st or other basis	(f) Income inclusion	
	rt et tatet		property	life	on date of tra	Insfer	at of Other Desis	for year of transfer (see instructions)	
Property described in sec. 936(h)(3)(B)									
ar aco. cootratojioj									
				ļ					
Property subject									
to sec. 367(d)				 					_
pursuant to Regs. sec. 1.367(a)-1(b)(5)				-	<u></u>				_
1100 (0)				-		-+			_
Totals		1, 4,	Estate to			-			_
			The state of the s	Marine Same					

Form 9	25 (Rev. 12-2017) Page 4
	Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?
b	If the answer to line 13a is "Yes," enter the total amount included in Income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer \$
	Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?
	If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$
C	If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied
	section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?
a	If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer > \$
	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Yes No 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?
a	If the answer to line 15c 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) > \$
16	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)?
Supp	lemental Part III Information Required To Be Reported (see instructions)
Part	Additional Information Regarding Transfer of Property (see instructions)
17	Enter the transferor's interest in the foreign transferee corporation before and after the transfer.
18	(a) Before 0.00% (b) After 0.3913% Type of nonrecognition transaction (see instructions) ▶ Section 351
19	Indicate whether any transfer reported in Part III is subject to any of the following.
a	Gain recognition under section 904(f)(3)
b	Gain recognition under section 904(f)(5)(F)
C	Recapture under section 1503(d)
d 20	Exchange gain under section 987
21a	Did this transfer result from a change in entity classification?
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$
C	Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes No

(Rev. December 2017) Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property to a Foreign Corporation • Go to www.lrs.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

Par			Saduende No. 128
Name	of transferor		Identifying number (see instructions)
Boy S	couts of America		22-1576300
1	If the transferor was a corporation, complete questions 1a tr	rough 1d,	
8	If the transfer was a section 361(a) or (b) transfer, was the t	ransferor controlled (under	section 368(c)) by 5
	or rewer domestic corporations?		□ Ves □ No
b	Did the transferor remain in existence after the transfer?		· · · · · Tes I No
	If not, list the controlling shareholder(s) and their identifying	number(s).	
_			
	Controlling shareholder	[de	ntifying number
-			
C	If the transferor was a member of an affiliated group fil	ing a connelidated where	tree it the
	corporation?	ing a consolicated territi	· · · · · · Yes No
			· · · · · · · · · · · · · · · · · · ·
	If not, list the name and employer identification number (EIN)	of the parent corporation.	
	Name of parent corporation		
	name or barent corporation	EIN of	parent corporation
d	Have basis adjustments under section 367(a)(5) been made?	4 2 4 4 4 1 4 4	· · · · Yes 🗆 No
	18 Abra Ava - 8		
2	If the transferor was a partner in a partnership that was the	actual transferor (but is n	ot treated as such under section 367),
	complete questions 2a through 2d.		•
	List the name and EIN of the transferor's partnership.		
	Name of partnership	EIN	of partnership
			•
Waterl	and Private Equity Fund VI C.V.		
b	Did the partner pick up its pro rata share of gain on the trans	for of partnership assets?	Foreign
C	Is the partner disposing of its entire interest in the partnershi	er of harmership assets?	· · · · · L Yes ☑ No
d	Is the partner disposing of an interest in a limited partners	processors	· · · · Yes 🗹 No
	securities market?	mb mar is tedinally traded	on an established
Part	Transferee Foreign Corporation Information (se	e instructions)	· · · · · Yes 🗸 No
3	Name of transferee (foreign corporation)	o mondottoria)	4a Identifying number, if any
Keylan	e Topholding B.V.		Foreign
5	Address (including country)		4b Reference ID number
	•		(see instructions)
Nieuw	s's-Gravelandseweg 17, 1405 HK Bussum, the Netherlands		· ·
6	Country code of country of incorporation or organization (see	instructions	KEY2017
NL			
7	Foreign law characterization (see instructions)		
	l Partnership		
8	Is the transferee foreign corporation a controlled foreign corp	oration?	· · · · · · · · · · · Yes 🗹 No
For Pa	perwork Reduction Act Notice, see separate instructions.	Cet. No. 16982D	Form 926 (Rev. 12-2017)

Part III Info		Transfer of Property	(see instructions)		Page 2
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	Various		211,237		
Stock and securities (other than those that qualify as eligible property under Regs. sec. 1.367(a)-2(b)(3))					
If "Yes," si	the only property transi kip the remainder of Pal nsferor transfer stock on agreement was filed?	t ill and go to Part IV.	ection 367(a) with respe	ect to which a gain	Yes No
		ive Trade or Business	exception under Regs	sec. 1.367(a)-2(a)(2)(i	
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other	(e) Gain recognized on transfer*
Tangible property (not listed under another category)			4710 40 4010101	Vaala	ualister*
Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))					
Financial asset (as described in Regs. sec. 1.367(a)- 2(b)(3))					
Certain tangible property to be leased (see Regs. sec. 1.367(a)-2(e))					

Totals

* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

Form 926 (Rev. 12-20) Section C—Prop 367(d))		ying for	Active Trade or Busi	ness excepti	on (other the	an intangible prop	Page erty subject to section
Type of property	(a) Date of transfer		(b) Description of property	Fair marke	t value on transfer	(d) Cost or other basis	(e) Gain recognized on transfer*
Inventory							
installment obligations, etc. (as described in Regs. sec. 1.367(a)- 2(c)(2))							
Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)- 2(c)(3))							
Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4))							
Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g))							
Property described in Regs. sec. 1.6038B-1(c)(4)(iv)							
Property described in Regs. sec. 1.6038B-1(c)(4)(vii)							
Totals							
11 Did the trained from the sections 1. a Transfer of Depreciation Branch los	ated in this section is subject to depreciation recapture or branch loss recapture, see instructions. The transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? Yes No ate whether the transferor was required to recognize income under final and Temporary Regulations ons 1.367(a)-2 through 1.367(a)-7 for any of the following. Ifter of property subject to section 367(a)(1) gain recognition . Yes No child on this section is subject to depreciation recapture . Yes No child on this section is subject to depreciation recapture . Yes No child on this section is subject to depreciation recapture in this section is subject to section 367(a)(1) gain recognition . Yes No child on this section is subject to depreciation recapture in this section is subject to section 367(a)(1) gain recognition . Yes No child on this section is subject to depreciation recapture in the trade or business exception under section 367(a)(3)?						
e Any other i If the answ the Supple	ncome recogniti rer to line 12a, 13 mental Part III In	lon provi 2b, 12c, <i>iformati</i> o	the amount of foreign sion contained in the a or 12e is "Yes," see ir n Required To Be Rep	above-referents structions for sections	nced regulation	ons . ,	· · □ Yes □ No ded in
Section D—Intar	igible property	under R	egs. sec. 1.367(a)-1(d	1)(5)			1
Type of property	(a) Date of transfer		(b) Description of property	(c) Useful life	(d) Arm's length pri on date of trans	(e) Cost or other basis	income lactusion for year of transfer (see instructions)
Property described in sec. 936(h)(3)(B)							
Property subject to sec. 367(d) pursuant to Regs. sec. 1,367(a)-1(b)(5)							
Totals	139		विभिन्न प्रमुख्य प्रकारका एक क्षेत्र का कार्यकार क्षेत्र का करणे	Park S			
- 2-22	انت تار الاختيان سيسيد	المائم سحوه سرام	السناية والمسابق والم	<u> </u>			I

Form	926 (Rav. 12-2017)
138	Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?
b	o if the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$
14a	Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?
	If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$
C	if the answer to line 14a is "No," did the transferor transfer any property for which it could have applied section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?
d	If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer > \$
15a	reasonably anticipated to exceed twenty years?
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?
ď	If the answer to line 15c 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) ▶\$
16	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)?
Supp	plemental Part III Information Required To Be Reported (see instructions)
_	
Part	IV Additional Information Regarding Transfer of Property (see instructions)
17	Enter the transferor's interest in the foreign transferee corporation before and after the transfer. (a) Before
18 19	Type of nonrecognition transaction (see instructions) ▶ Section 351 Indicate whether any transfer reported in Part III is subject to any of the following.
a	Gain recognition under section 904(f)(3)
b	Persontium under section 904(1)(5)(F)
d	Recapture under section 1503(d)
20	Did this transfer result from a change in entity classification?
21a	Did a domestic corporation make a distribution of property covered by section 367(e)(2) (see instructions)? Yes No If "Yes," complete lines 21b and 21c.

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$_

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

(Rev. December 2017)

Return by a U.S. Transferor of Property to a Foreign Corporation > Go to www.irs.gov/Form926 for instructions and the latest information.

Department of the Treasury
Internal Revenue Service

Part I U.S. Transferor Information (see instructions) ➤ Attach to your income tax return for the year of the transfer or distribution. OMB No. 1545-0028

Name	of transferor	 	Identifying number (see instructions)
Boy S	Scouts of America		
1	If the transferor was a corporation, complete questions ia ti	rough 1d	22-1576300
	If the transfer was a section 361(a) or (b) transfer, was the tor fewer domestic corporations?	transferor controlled (under	□ Ves □ Me
	Did the transferor remain in existence after the transfer? . If not, list the controlling shareholder(s) and their identifying	number(s).	· · · · · Tyes I No
	Controlling shareholder	lde	entifying number
C	If the transferor was a member of an affiliated group fill corporation?	ing a consolidated return	, was it the parent
	If not, list the name and employer identification number (EIN)	of the parent corporation.	100 - 100
	Name of parent corporation	EIN of	parent corporation
d	man and and a doubt out (a)(b) been thade:		
2 a	If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership.	actual transferor (but is r	not treated as such under section 367),
			· · · · · · · · · · · · · · · · · · ·
	Name of partnership	EIN	i of partnership
Waterl	and Private Equity Fund V C.V.		Foreign
D	Did the partner pick up its pro rata share of galn on the trans	fer of partnership assets?	· · · · · . □ Yes ☑ No
d	Is the partner disposing of its entire interest in the partnershi Is the partner disposing of an interest in a limited partners	p?	· · · · · Yes 🗹 No
Part	securides marker?		Yes 🗹 No
3 - ai i	100	e instructions)	
-	Name of transferee (foreign corporation)		4a Identifying number, if any
5	Address (including country)		Foreign 4b Reference ID number
Nieuw	e's-Gravelandseweg 17, 1405 HK Bussum, the Netherlands		(see instructions)
6	Country code of country of incorporation or organization (see	instructions)	REM2017
NL	<u> </u>		
7	Foreign law characterization (see Instructions)		
Limite 8	d Partnership		
	Is the transferee foreign corporation a controlled foreign corp	oration?	· · · · · □ Yes ☑ No

Form 926 (Rev. 12-201					Page 2
Part III Info	rmation Regarding sh, Stock, and Sec	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 (other than those that qualify as eligible property under	Various			14 19 at 1	
Regs. sec. 1.367(a)-2(b)(3))					
10 Did the tra recognition	nsferor transfer stock agreement was filed erty qualifying for Ad	art III and go to Part IV. or securities subject to se?	• • • • • • •		. Tyes No
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*
Tangible property (not listed under another category)				B Table	war jaka
Working interest in oil and gas property (as described in Regs. sec. 1.357(a)-2(b)(2) and (f))					
Financial asset (as described in Regs, sec. 1.367(a)-2(b)(3))					

* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

Certain tangible property to be leased (see Regs. sec. 1.367(a)-2(e))

367(d))	perty not quality	ing for Active Trade	or Business except	tion (other than	intangible prop	erty subject to section
Type of property	(a) Date of transfer	(b) Description property	of Fair mark	(c) et value on transfer	(d) Cost or other basis	(e) Gain recognized on transfer*
Inventory						
Installment obligations, etc. (as described in Regs. sec. 1.367(a)- 2(c)(2))						
Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)- 2(c)(3))						
Certain leased tangible property (as described in Regs. seo. 1.367(a)-2(c)(4))						
Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g))						
Property described in Regs. sec. 1.6038B-1(c)(4)(iv)						
Property described in Regs. sec. 1.6038B-1(c)(4)(vii)						
Totals	K. Andr. ACO.	Tipe of ware	71			
11 Did the tra 12 Indicate w sections 1. a Transfer of b Depreclatic c Branch los d if the answ e Any other i If the answ	nsferor transfer a hether the trans 367(a)-2 through foroperty subject on recapture s recapture (see yer to 12c is "Yes income recogniti yer to line 12a, 12 mental Part III in	s," enter the amount of on provision contained 2b, 12c, or 12e is "Yes formation Required To	he trade or business recognize income u the following. ain recognition. foreign branch loss in the above-reference see instructions for the property section.	s exception under final and To	er section 367(a)(i emporary Regula	Yes No Yes No Yes No Yes No
Section D—Intar		under Regs. sec. 1.36	7(a)-1(d)(5)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 936(h)(3)(B)						
Property subject to sec, 367(d) pursuant to Regs, sec, 1,367(a)-1(b)(5)						
Totals		1100	199			

Form 92	28 (Flev. 12-2017)	Pag	_{le} 4
13a	Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?	☐ Yes ☐ No)
b	If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$		
14a	Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?	☐ Yes ☐ No	ı
b	If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$		
C	If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied		
	section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?	☐ Yes ☐ No	
d	If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$		
15a	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?	□ Yes □ No	
c	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	Yes No	
	1.367(d)-1(c)(3)(ii) for any intangible property?	☐ Yes ☐ No	
d	If the answer to line 15c 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) ▶ \$		
16	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	
Supp	emental Part III Information Required To Be Reported (see instructions)		_

Part	Additional Information Regarding Transfer of Property (see instructions)			
17	Enter the transferor's interest in the foreign transferee corporation before and after the transfer. (a) Before			
18	Type of nonrecognition transaction (see instructions) ➤ Section 351			
19	Indicate whether any transfer reported in Part III is subject to any of the following.			
а	Gain recognition under section 904(f)(3)		Yes	√ No
b	Gain recognition under section 904(f)(5)(F)	$\overline{\Box}$	Yes	✓ No
C	Recapture under section 1503(d)	ñ	Yes	√ No
d	Exchange gain under section 987	Ħ	Yes	☑ No
20	Did this transfer result from a change in entity classification?	Ħ	Yes	☑ No
21a	Did a domestic corporation make a distribution of property covered by section 367(e)(2) (see instructions)?	Ħ	Yes	☑ No
	If "Yes," complete lines 21b and 21c.	_	100	E 110
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$			
C	Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes	□ No

Form 926

(Rev. December 2017)
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.

▶ 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

Name c	d transferor		Identifying number (see Instructions)	
Boy S	couts of America	22-1576300		
1	If the transferor was a corporation, complete questions 1a the	rough 1d.		
а	If the transfer was a section 361(a) or (b) transfer, was the tr	ansferor controlled (under	section 368(c)) by 5	
	or fewer domestic corporations?			
ь	Did the transferor remain in existence after the transfer? .		Yes 🗆 No	
	If not, list the controlling shareholder(s) and their identifying n	umber(s).		
	Controlling shareholder	ider	ntifying number	
		1001	· · · · · · · · · · · · · · · · · · ·	
		···		
С	If the transferor was a member of an affiliated group fill corporation?		was it the parent	
	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 n	ot treated as such under section 367	
	complete questions 2a through 2d.			
<u>a</u>	List the name and EiN of the transferor's partnership.			
	Name of partnership	EIN	of partnership	
	Bravo Fund XI Global, L.P.		98-1367469	
b	Did the partner pick up its pro rata share of gain on the trans	• •	Yes 🗹 No	
C	is the partner disposing of its entire interest in the partnershi			
d	Is the partner disposing of an interest in a limited partners			
Dart	securities market?	- I - I - I - I - I	Yes 🗹 No	
3	Name of transferee (foreign corporation)	e instructions)	e-laborate do a completo de co	
_	Parent Limited	l	4a Identifying number, if any	
5	Address (Including country)		Foreign 4b Reference ID number	
•	Abdiese (including country)		(see instructions)	
Colum	n Floor, St. Paul's Gate, 22-24 New Street, St. Helier, Jersey JE1 4T	'R	KOF2017	
· vuru			1401 2017	
6	Country code of country of Incorporation or organization (see	instructions)		
6	Country code of country of incorporation or organization (see	instructions)		
6		instructions)		
6 JE 7	Country code of country of incorporation or organization (see			

Form 926 (Rev. 12-20)	rmation Regarding	Fransfer of Property	(see instructions)	-	Page 2
Section A—Ca	sh, Stock, and Secu	rities	,		
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 (other than those that qualify as eligible property under Regs. sec. 1.367(a)-2(b)(3))	07/07/2017		275,537		
If "Yes," si 10 Did the tra recognition	the only property transf tip the remainder of Par nsferor transfer stock on agreement was filed?	t III and go to Part IV. r securities subject to se			Yes No
	erty qualifying for Act			. sec. 1.367(a)-2(a)(2)(i) and (ii)
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*
Tangible property (not listed under another category)				None	Unitation
Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))					
Financial asset (as described in Regs, sec. 1.367(a)- 2(b)(3))					
Certain tangible property to be leased (see Regs. sec. 1.367(a)-2(e))					

Totals

* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions,

Section C — Prop 367(d))	perty not qualify	ing for	Active Trade or Busin	ness excepti	on (other than	n intangible prope	erty subject to section	
Type of property	(a) Date of transfer		(b) Description of property	Fair marke date of t	t value on transfer	(d) Cost or other basis	(a) Gain recognized on transfer*	
Inventory								
Installment obligations, etc. (as	<u> </u>							
described in Regs.								
sec. 1.367(a)-							-	
2(c)(2))				 				
Nonfunctional								
currency, etc. (as								
described in Regs. sec. 1.367(a)-								
2(c)(3))								
Certain leased				ļ				
tangible property (as described in	<u> </u>							
Regs. sec.								
1.367(a)-2(c)(4))				-		<u> </u>		
				-				
Certain property								
to be retransferred (see Regs. sec.								
1.367(a)-2(g))								
Property described								
in Regs. sec. 1.6038B-1(c)(4)(iv)								
Property described in Regs, sec.								
1.6038B-1(c)(4)(vii)			<u> </u>					
		7 T T T T T T T T T T T T T T T T T T T		1				
	The same of the same of the same of the same of		lepreciation recapture or					
11 Did the tra	nsferor transfer	assets t	hat qualify for the tradi	a or business	exception und	ructions. ier section 367/a)/:	3)?	
12 Indicate w	sferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? Yes No ether the transferor was required to recognize income under final and Temporary Regulations							
sections 1.	.367(a)-2 througi	1.367((a)-7 for any of the folic	wing.		The state of the s		
a Transfer of	property subject	t to sec	otion 367(a)(1) gain reco	ognition. 👵	9.9	90 - 80 60 800 60	Yes 🗌 No	
	on recapture .			(90)	9 9	X 81 (0 KD60 K	😳 🕒 Yes 🗌 No	
	s recapture (see				g · · · · g	8 . 60666	Yes 🗌 No	
d If the answ	er to 12c is "Yes	s," ente	r the amount of foreign	branch loss	recapture 🟲 🕯			
e Any other	income recogniti	on prov	nsion contained in the	above-retere	nced regulation	ns	🗌 Yes 🗎 No	
the Supple	rei io ilite iza, i. Imental Part III In	cu, IZC formati	, or 12e is "Yes," see i on Required To Be Re	nstructions to coded sectio	er information t	hat must be includ	led in	
Section D-Intar	gible property	under F	Regs. sec. 1.367(a)-1(d)(5)	II Delow.			
					(A)	7	(f)	
Type of property	(a) Date of transfer		(b) Description of property	(c) Useful life	(d) Arm's length pric on date of transf	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)	
							(see mandedone)	
Property described								
In sec. 936(h)(3)(B)						-		
Dramants autobact								
Property subject to sec. 367(d)							<u></u>	
pursuant to Regs.	<u> </u>							
sec. 1.367(a)-1(b)(5)								
Tetele	1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.			A to the second second second second		1		
Totals	المتنافعيات المتحقا							

Form	n 926 (Rev. 12-2017)
13	Page Page
	Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)? b If the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is "Yes " certain the total of the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Yes " certain the answer to line 13a is " Certain the answer to line 13a is " Certain the answer to line 13a is " Certain the answer to line 13a is " Ce
	(d), if any, for the transfer of all such property on the income towards for the transfer of all such property on the income towards for the control of the
14	a Did the transferor apply section 367/d) to a transfer of any average.
١	b If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the
•	If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied
C	section 367(d) pursuant to Regulations section 1.367(a)-1(b)(6) but did not?
15a	reasonably anticipated to exceed twenty years?
C	Did the transferor choose to apply the 20-year inclusion period provided under Population useful life? Yes No
	The state of the s
-	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(a)(2)(a) b. \$
16	vvas any intendible property transferred considered as a 44-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?
Supp	plemental Part III Information Required To Be Reported (see instructions)
	(see instructions)
Dowt	
<u>Part</u>	IV Additional Information Regarding Transfer of Property (see instructions)
17	Enter the transferor's interest in the foreign transferee corporation before and after the transfer. (a) Before0.00% (b) After0.08%
18	Type of nonrecognition transaction (see instructional b. Seetier 254
19	molecute whether any transfer reported in Part III is subject to any of the first
a b	Caut recognition under section 9(x/m/s)
C	
ď	
20	Did this transfer result from a change in entity clangification (
21a	Did a domestic corporation make a distribution of property squared by said to a squared by said to the squared by
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$
-	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)?
	Tes Li No