

Form 990-T

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

OMB No 1545-0047

2019

For calendar year 2019 or other tax year beginning 1912, 2019, and ending 1912

Go to www.irs.gov/Form990T for instructions and the latest information.

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

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

Department of the Treasury Internal Revenue Service

Part I: Exempt under section 501(c)(3) and other information. Includes organization name (ELBRIDGE STUART FOUNDATION), address (500 WASHINGTON STREET, 8TH FLOOR, SAN FRANCISCO, CA 94111), and employer identification number (20-0882784).

Part C: Book value of all assets at end of year (398,384,368) and Part G: Check organization type (501(c) corporation).

Part H: Enter the number of the organization's unrelated trades or businesses (1) and describe the only (or first) unrelated trade or business here (INCOME FROM PASS-THROUGH ENTITIES).

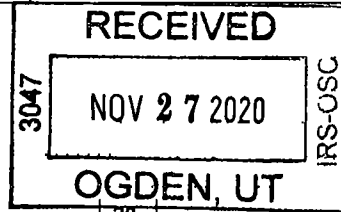
Part I: During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group? (No).

Part J: The books are in care of (STUART FOUNDATION) and Telephone number (415-393-1551).

Table for Part III: Unrelated Trade or Business Income. Columns include (A) Income, (B) Expenses, and (C) Net. Total income is -229,057 and total net is -229,057.

Part III: Deductions Not Taken Elsewhere (See instructions for limitations on deductions.) (Deductions must be directly connected with the unrelated business income.)

Table for Part III: Deductions Not Taken Elsewhere. Lines 14 through 31. Total deductions (line 28) is -229,057, resulting in unrelated business taxable income (line 31) of -229,057.



9-8

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**Part III Total Unrelated Business Taxable Income**

32	Total of unrelated business taxable income computed from all unrelated trades or businesses (see instructions)	32	-229,057.
33	Amounts paid for disallowed fringes	33	
34	Charitable contributions (see instructions for limitation rules)	34	
35	Total unrelated business taxable income before pre-2018 NOLs and specific deduction Subtract line 34 from the sum of lines 32 and 33	35	-229,057.
36	Deduction for net operating loss arising in tax years beginning before January 1, 2018 (see instr.)	36	
37	Total of unrelated business taxable income before specific deduction Subtract line 36 from line 35	37	-229,057.
38	Specific deduction (Generally \$1,000, but see line 38 instructions for exceptions)	38	
39	Unrelated business taxable income. Subtract line 38 from line 37. If line 38 is greater than line 37, enter the smaller of zero or line 37	39	-229,057.

**Part IV Tax Computation**

40	Organizations Taxable as Corporations. Multiply line 39 by 21% (0.21)	40	0.
41	Trusts Taxable at Trust Rates. See instructions for tax computation. Income tax on the amount on line 39 from: <input type="checkbox"/> Tax rate schedule or <input type="checkbox"/> Schedule D (Form 1041)	41	
42	Proxy tax. See instructions	42	
43	Alternative minimum tax (trusts only)	43	
44	Tax on Noncompliant Facility Income. See instructions	44	
45	Total. Add lines 42, 43, and 44 to line 40 or 41, whichever applies	45	0.

**Part V Tax and Payments**

46 a	Foreign tax credit (corporations attach Form 1118, trusts attach Form 1116)	46 a	
b	Other credits (see instructions)	46 b	
c	General business credit. Attach Form 3800 (see instructions)	46 c	
d	Credit for prior year minimum tax (attach Form 8801 or 8827)	46 d	
e	Total credits. Add lines 46a through 46d	46 e	0.
47	Subtract line 46e from line 45	47	0.
48	Other taxes. Check if from <input type="checkbox"/> Form 4255 <input type="checkbox"/> Form 8611 <input type="checkbox"/> Form 8697 <input type="checkbox"/> Form 8866 <input type="checkbox"/> Other (attach schedule)	48	
49	Total tax. Add lines 47 and 48 (see instructions)	49	0.
50	2019 net 965 tax liability paid from Form 965-A or Form 965-B, Part II, column (k), line 3	50	
51 a	Payments. A 2018 overpayment credited to 2019	51 a	
b	2019 estimated tax payments	51 b	
c	Tax deposited with Form 8868	51 c	
d	Foreign organizations' Tax paid or withheld at source (see instructions)	51 d	
e	Backup withholding (see instructions)	51 e	
f	Credit for small employer health insurance premiums (attach Form 8941)	51 f	
g	Other credits, adjustments, and payments <input type="checkbox"/> Form 2439 <input type="checkbox"/> Form 4136 <input type="checkbox"/> Other Total	51 g	
52	Total payments. Add lines 51a through 51g	52	0.
53	Estimated tax penalty (see instructions). Check if Form 2220 is attached	53	
54	Tax due. If line 52 is less than the total of lines 49, 50, and 53, enter amount owed	54	
55	Overpayment. If line 52 is larger than the total of lines 49, 50, and 53, enter amount overpaid	55	
56	Enter the amount of line 55 you want. Credited to 2020 estimated tax <input type="checkbox"/> Refunded <input type="checkbox"/>	56	

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

57	At any time during the 2019 calendar year, did the organization have an interest in or a signature or other authority over a financial account (bank, securities, or other) in a foreign country? If 'Yes,' the organization may have to file FinCEN Form 114, Report of Foreign Bank and Financial Accounts. If 'Yes,' enter the name of the foreign country here	Yes	No
58	During the tax year, did the organization receive a distribution from, or was it the grantor of, or transferor to, a foreign trust? If 'Yes,' see instructions for other forms the organization may have to file		X
59	Enter the amount of tax-exempt interest received or accrued during the tax year \$ 0.		

**Sign Here**

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

*Diana Sosa* Signature of officer      11/12/2020 Date      CFO Title

May the IRS discuss this return with the preparer shown below (see instructions)?  Yes  No

**Paid Preparer Use Only**

Print/Type preparer's name: DIANA SOSA      Preparer's signature: *Diana Sosa, CPA*      Date: 11.10.2020

Firm's name: BREGANTE + COMPANY LLP, CPA'S      Check  if self employed      PTIN: P00290785

Firm's address: 301 BATTERY ST, 2 MEZZANINE      Firm's EIN: 94-2861940

SAN FRANCISCO, CA 94111      Phone no: (415) 777-1001

**Schedule A – Cost of Goods Sold.** Enter method of inventory valuation ▶

1	Inventory at beginning of year	1		6	Inventory at end of year	6		
2	Purchases	2		7	<b>Cost of goods sold.</b> Subtract line 6 from line 5. Enter here and in Part I, line 2	7		
3	Cost of labor	3						
4 a	Additional section 263A costs (attach schedule)	4 a					Yes	No
b	Other costs (attach sch.)	4 b		8	Do the rules of section 263A (with respect to property produced or acquired for resale) apply to the organization?			X
5	<b>Total.</b> Add lines 1 through 4b	5						

**Schedule C – Rent Income (From Real Property and Personal Property Leased With Real Property)** (see instructions)

1 Description of property		
(1)		
(2)		
(3)		
(4)		
<b>2 Rent received or accrued</b>		
(a) From personal property (if the percentage of rent for personal property is more than 10% but not more than 50%)	(b) From real and personal property (if the percentage of rent for personal property exceeds 50% or if the rent is based on profit or income)	3(a) Deductions directly connected with the income in columns 2(a) and 2(b) (attach schedule)
(1)		
(2)		
(3)		
(4)		
Total	Total	
(c) <b>Total income.</b> Add totals of columns 2(a) and 2(b). Enter here and on page 1, Part I, line 6, column (A) ▶		(b) <b>Total deductions.</b> Enter here and on page 1, Part I, line 6, column (B) ▶

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

1 Description of debt-financed property		2 Gross income from or allocable to debt-financed property	3 Deductions directly connected with or allocable to debt-financed property	
			(a) Straight line depreciation (attach sch.)	(b) Other deductions (attach schedule)
(1)				
(2)				
(3)				
(4)				
4 Amount of average acquisition debt on or allocable to debt-financed property (attach schedule)	5 Average adjusted basis of or allocable to debt-financed property (attach schedule)	6 Column 4 divided by column 5	7 Gross income reportable (column 2 x column 6)	8 Allocable deductions (column 6 x total of columns 3(a) and 3(b))
(1)		0%		
(2)		0%		
(3)		0%		
(4)		0%		
<b>Totals</b> ▶			Enter here and on page 1, Part I, line 7, column (A).	Enter here and on page 1, Part I, line 7, column (B)
<b>Total dividends-received deductions</b> included in column 8 ▶				

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

1 Name of controlled organization	2 Employer identification number	Exempt Controlled Organizations			
		3 Net unrelated income (loss) (see instructions)	4 Total of specified payments made	5 Part of column 4 that is included in the controlling organization's gross income	6 Deductions directly connected with income in column 5
(1)					
(2)					
(3)					
(4)					

Nonexempt Controlled Organizations

7 Taxable Income	8 Net unrelated income (loss) (see instructions)	9 Total of specified payments made	10 Part of column 9 that is included in the controlling organization's gross income	11 Deductions directly connected with income in column 10
(1)				
(2)				
(3)				
(4)				

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

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

**Totals**

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

1 Description of income	2 Amount of income	3 Deductions directly connected (attach schedule)	4 Set-asides (attach schedule)	5 Total deductions and set-asides (column 3 plus column 4)
(1)				
(2)				
(3)				
(4)				

Enter here and on page 1, Part I, line 9, column (A)

Enter here and on page 1, Part I, line 9, column (B)

**Totals**

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

1 Description of exploited activity	2 Gross unrelated business income from trade or business	3 Expenses directly connected with production of unrelated business income	4 Net income (loss) from unrelated trade or business (column 2 minus column 3). If a gain, compute columns 5 through 7	5 Gross income from activity that is not unrelated business income	6 Expenses attributable to column 5	7 Excess exempt expenses (column 6 minus column 5, but not more than column 4)
(1)						
(2)						
(3)						
(4)						

Enter here and on page 1, Part I, line 10, column (A)

Enter here and on page 1, Part I, line 10, column (B)

Enter here and on page 1, Part II, line 25.

**Totals**

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

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

1 Name of periodical	2 Gross advertising income	3 Direct advertising costs	4 Advertising gain or (loss) (col 2 minus col 3). If a gain, compute cols. 5 through 7	5 Circulation income	6 Readership costs	7 Excess readership costs (col 6 minus col 5, but not more than col 4)
(1)						
(2)						
(3)						
(4)						

**Totals** (carry to Part II, line (5))

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

1 Name of periodical	2 Gross advertising income	3 Direct advertising costs	4 Advertising gain or (loss) (col 2 minus col 3) If a gain, compute cols 5 through 7.	5 Circulation income	6 Readership costs	7 Excess readership costs (col 6 minus col 5, but not more than col 4)
(1)						
(2)						
(3)						
(4)						
<b>Totals from Part I</b>						
<b>Totals, Part II (lines 1– 5)</b>	Enter here and on page 1, Part I, line 11, column (A)	Enter here and on page 1, Part I, line 11, column (B)				Enter here and on page 1, Part II, line 26

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

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

STATEMENT 1  
FORM 990-T, PART I, LINE 5  
INCOME (LOSS) FROM PARTNERSHIPS AND S CORPORATIONS

NAME	GROSS INCOME	DEDUCTIONS	INCOME (LOSS)
TENASKA POWER FUND LP	\$ -5,177.	\$ 0.	\$ -5,177.
HIGHFIELDS CAPITAL IV	-2,864.	0.	-2,864.
TPF II	-11,577.	0.	-11,577.
DC CAPITAL PARTNERS II	1,087,066.	0.	1,087,066.
DEERFIELD RCA HOLDINS, L.P.	-146,837.	0.	-146,837.
FORTRESS SECURED LENDING FUND I (A)	9,602.	0.	9,602.
TIFF REALTY & RESOURCE	757.	0.	757.
FORTRESS CREDIT OPPORTUNITIES FUND B	17.	0.	17.
OCM OPPORTUNITIES FUND VI, LP	5,500.	0.	5,500.
VENTURE INVESTMENT ASSOCIATES V, LP	-612.	0.	-612.
DEERFIELD PRIVATE DESIGN FUND IV, LP	-103,843.	0.	-103,843.
ABERDEEN VENTURE PARTNERS IV, LP	-1.	0.	-1.
LEXINGTON MIDDLE MARKET INVESTORS IV	-24,521.	0.	-24,521.
WAUD CAPITAL PARTNERS QP IV, LP	-659,039.	0.	-659,039.
ROCK SPRINGS CAPITAL FUND LP	14,987.	0.	14,987.
DEERFIELD PARNTERS, LP	-3,578.	0.	-3,578.
DEERFIELD RCA HOLDINGS IV, LP	-98,200.	0.	-98,200.
DEERFIELD RE HOLDINGS IV, LP	11,250.	0.	11,250.
DEERFIELD PH HOLDINGS IV, LP	-16,165.	0.	-16,165.
DEERFIELD PRIVATE DESIGN FUND III, LP	-12,090.	0.	-12,090.
GENERAL ATLANTIC	-174.	0.	-174.
GRAHAM PARTNERS V, LP	-215,854.	0.	-215,854.
WAUD CAPITAL PARTNERS QP V LP	-57,704.	0.	-57,704.
		TOTAL	\$ <u>-229,057.</u>

STATEMENT 2  
FORM 990-T, PART II, LINE 30  
NET OPERATING LOSS DEDUCTION

LOSS YEAR ENDING	ORIGINAL LOSS	LOSS PREVIOUSLY USED	LOSS AVAILABLE
12/31/18	\$ 516,608.	\$ 0.	\$ 516,608.
NET OPERATING LOSS AVAILABLE			\$ 516,608.
TAXABLE INCOME			\$ -229,057.
NET OPERATING LOSS DEDUCTION (LIMITED TO TAXABLE INCOME)			\$ <u>0.</u>

STATEMENT 3  
FORM 990-T, PART III, LINE 36  
NET OPERATING LOSS DEDUCTION

LOSS YEAR ENDING	ORIGINAL LOSS	LOSS PREVIOUSLY USED	LOSS AVAILABLE
12/31/13	\$ 1,240,798.	\$ 93,738.	\$ 1,147,060.
12/31/14	930,266.	0.	930,266.
12/31/16	743,197.	0.	743,197.

STATEMENT 3 (CONTINUED)  
FORM 990-T, PART III, LINE 36  
NET OPERATING LOSS DEDUCTION

LOSS YEAR ENDING	ORIGINAL LOSS	LOSS PREVIOUSLY USED	LOSS AVAILABLE
12/31/17	\$ 263,352.	\$ 0.	263,352.
NET OPERATING LOSS AVAILABLE			\$ 3,083,875.
TAXABLE INCOME			\$ -229,057.
NET OPERATING LOSS DEDUCTION (LIMITED TO TAXABLE INCOME)			\$ 0.