

Return of Private Foundation

or Section 4947(a)(1) Trust Treated as Private Foundation

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2020

Open to Public Inspection

Form **990-PF**

Department of the Treasury
Internal Revenue Service

For calendar year 2020 or tax year beginning , and ending

Name of foundation Luminate Foundation, Inc.		A Employer identification number 82-3941326
Number and street (or P.O. box number if mail is not delivered to street address) 1200 17th Street NW	Room/suite 501	B Telephone number 202-630-9991
City or town, state or province, country, and ZIP or foreign postal code Washington, DC 20036		C If exemption application is pending, check here ... <input type="checkbox"/>
G Check all that apply: <input type="checkbox"/> Initial return <input type="checkbox"/> Initial return of a former public charity <input type="checkbox"/> Final return <input type="checkbox"/> Amended return <input type="checkbox"/> Address change <input type="checkbox"/> Name change		D 1. Foreign organizations, check here <input type="checkbox"/> 2. Foreign organizations meeting the 85% test, check here and attach computation <input type="checkbox"/>
H Check type of organization: <input checked="" type="checkbox"/> Section 501(c)(3) exempt private foundation <input type="checkbox"/> Section 4947(a)(1) nonexempt charitable trust <input type="checkbox"/> Other taxable private foundation		E If private foundation status was terminated under section 507(b)(1)(A), check here ... <input type="checkbox"/>
I Fair market value of all assets at end of year (from Part II, col. (c), line 16) \$ 57,888,270.	J Accounting method: <input type="checkbox"/> Cash <input checked="" type="checkbox"/> Accrual <input type="checkbox"/> Other (specify) _____ (Part I, column (d), must be on cash basis.)	
F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here ... <input type="checkbox"/>		

Part I Analysis of Revenue and Expenses <small>(The total of amounts in columns (b), (c), and (d) may not necessarily equal the amounts in column (a).)</small>		(a) Revenue and expenses per books	(b) Net investment income	(c) Adjusted net income	(d) Disbursements for charitable purposes (cash basis only)
Revenue	1 Contributions, gifts, grants, etc., received	52,776,798.			
	2 Check <input type="checkbox"/> if the foundation is not required to attach Sch. B				
	3 Interest on savings and temporary cash investments				
	4 Dividends and interest from securities	323,058.	323,058.		Statement 1
	5a Gross rents				
	b Net rental income or (loss)				
	6a Net gain or (loss) from sale of assets not on line 10	-1,126,870.			
	b Gross sales price for all assets on line 6a	55,735,033.			
	7 Capital gain net income (from Part IV, line 2)		55,735,024.		
	8 Net short-term capital gain				
	9 Income modifications				
	10a Gross sales less returns and allowances				
b Less: Cost of goods sold					
c Gross profit or (loss)					
11 Other income					
12 Total. Add lines 1 through 11	51,972,986.	56,058,082.	0.		
Operating and Administrative Expenses	13 Compensation of officers, directors, trustees, etc.	0.	0.	0.	0.
	14 Other employee salaries and wages				
	15 Pension plans, employee benefits				
	16a Legal fees				
	b Accounting fees				
	c Other professional fees				
	17 Interest				
	18 Taxes	724,793.	0.	0.	0.
	19 Depreciation and depletion				
	20 Occupancy				
	21 Travel, conferences, and meetings				
	22 Printing and publications				
	23 Other expenses				
	24 Total operating and administrative expenses. Add lines 13 through 23	724,793.	0.	0.	0.
	25 Contributions, gifts, grants paid	62,085,349.			48,968,747.
26 Total expenses and disbursements. Add lines 24 and 25	62,810,142.	0.	0.	48,968,747.	
27 Subtract line 26 from line 12:					
a Excess of revenue over expenses and disbursements	-10,837,156.				
b Net investment income (if negative, enter -0-)		56,058,082.			
c Adjusted net income (if negative, enter -0-)			0.		

Part II Balance Sheets		Attached schedules and amounts in the description column should be for end-of-year amounts only.		
		Beginning of year	End of year	
		(a) Book Value	(b) Book Value	(c) Fair Market Value
Assets	1 Cash - non-interest-bearing			
	2 Savings and temporary cash investments	53,482,648.	56,069,782.	56,069,782.
	3 Accounts receivable			
	Less: allowance for doubtful accounts			
	4 Pledges receivable			
	Less: allowance for doubtful accounts			
	5 Grants receivable			
	6 Receivables due from officers, directors, trustees, and other disqualified persons			
	7 Other notes and loans receivable			
	Less: allowance for doubtful accounts			
	8 Inventories for sale or use			
	9 Prepaid expenses and deferred charges			
	10a Investments - U.S. and state government obligations			
	b Investments - corporate stock			
	c Investments - corporate bonds			
	11 Investments - land, buildings, and equipment: basis			
Less: accumulated depreciation				
12 Investments - mortgage loans				
13 Investments - other	1,805,500.	0.	0.	
14 Land, buildings, and equipment: basis				
Less: accumulated depreciation				
15 Other assets (describe)	0.	1,818,488.	1,818,488.	
16 Total assets (to be completed by all filers - see the instructions. Also, see page 1, item I)	55,288,148.	57,888,270.	57,888,270.	
Liabilities	17 Accounts payable and accrued expenses	45,000.		
	18 Grants payable		22,153,333.	
	19 Deferred revenue			
	20 Loans from officers, directors, trustees, and other disqualified persons			
	21 Mortgages and other notes payable			
	22 Other liabilities (describe Federal Excise Tax)	56,053.	671,729.	
23 Total liabilities (add lines 17 through 22)	101,053.	22,825,062.		
Net Assets or Fund Balances	Foundations that follow FASB ASC 958, check here <input checked="" type="checkbox"/> and complete lines 24, 25, 29, and 30.			
	24 Net assets without donor restrictions	48,094,128.	-18,866,325.	
	25 Net assets with donor restrictions	7,092,967.	53,929,533.	
	Foundations that do not follow FASB ASC 958, check here <input type="checkbox"/> and complete lines 26 through 30.			
	26 Capital stock, trust principal, or current funds			
	27 Paid-in or capital surplus, or land, bldg., and equipment fund			
	28 Retained earnings, accumulated income, endowment, or other funds			
29 Total net assets or fund balances	55,187,095.	35,063,208.		
30 Total liabilities and net assets/fund balances	55,288,148.	57,888,270.		

Part III Analysis of Changes in Net Assets or Fund Balances

1 Total net assets or fund balances at beginning of year - Part II, column (a), line 29 (must agree with end-of-year figure reported on prior year's return)	1	55,187,095.
2 Enter amount from Part I, line 27a	2	-10,837,156.
3 Other increases not included in line 2 (itemize)	3	0.
4 Add lines 1, 2, and 3	4	44,349,939.
5 Decreases not included in line 2 (itemize) Assumed grants from an affiliate	5	9,286,731.
6 Total net assets or fund balances at end of year (line 4 minus line 5) - Part II, column (b), line 29	6	35,063,208.

Part IV Capital Gains and Losses for Tax on Investment Income See Attached Statement

(a) List and describe the kind(s) of property sold (for example, real estate, 2-story brick warehouse; or common stock, 200 shs. MLC Co.)	(b) How acquired P - Purchase D - Donation	(c) Date acquired (mo., day, yr.)	(d) Date sold (mo., day, yr.)
1a			
b			
c			
d			
e			

(e) Gross sales price	(f) Depreciation allowed (or allowable)	(g) Cost or other basis plus expense of sale	(h) Gain or (loss) ((e) plus (f) minus (g))
a			
b			
c			
d			
e 55,735,033.		9.	55,735,024.

Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69.

(i) FMV as of 12/31/69	(j) Adjusted basis as of 12/31/69	(k) Excess of col. (i) over col. (j), if any	(l) Gains (Col. (h) gain minus col. (k), but not less than -0-) or Losses (from col. (h))
a			
b			
c			
d			
e			55,735,024.

2 Capital gain net income or (net capital loss) { If gain, also enter in Part I, line 7 If (loss), enter -0- in Part I, line 7	2	55,735,024.
3 Net short-term capital gain or (loss) as defined in sections 1222(5) and (6): If gain, also enter in Part I, line 8, column (c). See instructions. If (loss), enter -0- in Part I, line 8	3	0.

Part V Qualification Under Section 4940(e) for Reduced Tax on Net Investment Income
SECTION 4940(e) REPEALED ON DECEMBER 20, 2019 - DO NOT COMPLETE.

1 Reserved	(a) Reserved	(b) Reserved	(c) Reserved	(d) Reserved
	Reserved			
	Reserved			
	Reserved			
	Reserved			
	Reserved			
2 Reserved			2	
3 Reserved			3	
4 Reserved			4	
5 Reserved			5	
6 Reserved			6	
7 Reserved			7	
8 Reserved			8	

Part VI Excise Tax Based on Investment Income (Section 4940(a), 4940(b), or 4948 - see instructions)

1a	Exempt operating foundations described in section 4940(d)(2), check here <input type="checkbox"/> and enter "N/A" on line 1. Date of ruling or determination letter: _____ (attach copy of letter if necessary-see instructions)		
b	Reserved	1	779,207.
c	All other domestic foundations enter 1.39% of line 27b. Exempt foreign organizations, enter 4% of Part I, line 12, col. (b)		
2	Tax under section 511 (domestic section 4947(a)(1) trusts and taxable foundations only; others, enter -0-)	2	0.
3	Add lines 1 and 2	3	779,207.
4	Subtitle A (income) tax (domestic section 4947(a)(1) trusts and taxable foundations only; others, enter -0-)	4	0.
5	Tax based on investment income. Subtract line 4 from line 3. If zero or less, enter -0-	5	779,207.
6	Credits/Payments:		
a	2020 estimated tax payments and 2019 overpayment credited to 2020	6a	133,585.
b	Exempt foreign organizations - tax withheld at source	6b	0.
c	Tax paid with application for extension of time to file (Form 8868)	6c	615,000.
d	Backup withholding erroneously withheld	6d	0.
7	Total credits and payments. Add lines 6a through 6d	7	748,585.
8	Enter any penalty for underpayment of estimated tax. Check here <input checked="" type="checkbox"/> if Form 2220 is attached	8	0.
9	Tax due. If the total of lines 5 and 8 is more than line 7, enter amount owed See Statement 4	9	30,622.
10	Overpayment. If line 7 is more than the total of lines 5 and 8, enter the amount overpaid	10	
11	Enter the amount of line 10 to be: Credited to 2021 estimated tax Refunded	11	

Part VII-A Statements Regarding Activities

	Yes	No
1a		X
1b		X
1c		X
d		
e		
2		X
3		X
4a		X
4b		N/A
5		X
6	X	
7	X	
8a		
8b	X	
9		X
10	X	

Part VII-A Statements Regarding Activities (continued)

Table with 3 columns: Question, Yes, No. Rows 11-16 containing questions about controlled entities, distributions, public inspection requirements, and charitable trusts.

Part VII-B Statements Regarding Activities for Which Form 4720 May Be Required

File Form 4720 if any item is checked in the "Yes" column, unless an exception applies.

Table with 3 columns: Question, Yes, No. Rows 1a-4b containing questions about disqualifying acts, taxes on failure to distribute income, and business interests.

Part VII-B Statements Regarding Activities for Which Form 4720 May Be Required (continued)

		Yes	No
5a During the year, did the foundation pay or incur any amount to:			
(1) Carry on propaganda, or otherwise attempt to influence legislation (section 4945(e))?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
(2) Influence the outcome of any specific public election (see section 4955); or to carry on, directly or indirectly, any voter registration drive?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
(3) Provide a grant to an individual for travel, study, or other similar purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
(4) Provide a grant to an organization other than a charitable, etc., organization described in section 4945(d)(4)(A)? See instructions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
(5) Provide for any purpose other than religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
b If any answer is "Yes" to 5a(1)-(5), did any of the transactions fail to qualify under the exceptions described in Regulations section 53.4945 or in a current notice regarding disaster assistance? See instructions		5b	X
Organizations relying on a current notice regarding disaster assistance, check here ▶ <input type="checkbox"/>			
c If the answer is "Yes" to question 5a(4), does the foundation claim exemption from the tax because it maintained expenditure responsibility for the grant? See Statement 9	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
If "Yes," attach the statement required by Regulations section 53.4945-5(d).			
6a Did the foundation, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
b Did the foundation, during the year, pay premiums, directly or indirectly, on a personal benefit contract? If "Yes" to 6b, file Form 8870.		6b	X
7a At any time during the tax year, was the foundation a party to a prohibited tax shelter transaction?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
b If "Yes," did the foundation receive any proceeds or have any net income attributable to the transaction?	N/A	7b	
8 Is the foundation subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or excess parachute payment(s) during the year?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

Part VIII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors

1 List all officers, directors, trustees, and foundation managers and their compensation.

(a) Name and address	(b) Title, and average hours per week devoted to position	(c) Compensation (If not paid, enter -0-)	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances
See Statement 8		0.	0.	0.

2 Compensation of five highest-paid employees (other than those included on line 1). If none, enter "NONE."

(a) Name and address of each employee paid more than \$50,000	(b) Title, and average hours per week devoted to position	(c) Compensation	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances
NONE				

Total number of other employees paid over \$50,000 ▶ 0

Part VIII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors *(continued)*

3 Five highest-paid independent contractors for professional services. If none, enter "NONE."

(a) Name and address of each person paid more than \$50,000	(b) Type of service	(c) Compensation
NONE		

Total number of others receiving over \$50,000 for professional services ▶ **0**

Part IX-A Summary of Direct Charitable Activities

List the foundation's four largest direct charitable activities during the tax year. Include relevant statistical information such as the number of organizations and other beneficiaries served, conferences convened, research papers produced, etc.	Expenses
1	
See Statement 10	15,640,203.
2	
See Statement 11	12,655,579.
3	
See Statement 12	8,333,833.
4	
See Statement 13	7,979,508.

Part IX-B Summary of Program-Related Investments

Describe the two largest program-related investments made by the foundation during the tax year on lines 1 and 2.	Amount
1	
See Statement 14	1,000,000.
2 Fund investment to help drive CcHUB Growth Capital Limited's financial sustainability and seed innovation	
	715,488.
All other program-related investments. See instructions.	
3	
Total. Add lines 1 through 3 ▶	1,715,488.

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Part X Minimum Investment Return (All domestic foundations must complete this part. Foreign foundations, see instructions.)

1 Fair market value of assets not used (or held for use) directly in carrying out charitable, etc., purposes:			
a	Average monthly fair market value of securities	1a	215,063.
b	Average of monthly cash balances	1b	32,522,902.
c	Fair market value of all other assets	1c	103,000.
d	Total (add lines 1a, b, and c)	1d	32,840,965.
e	Reduction claimed for blockage or other factors reported on lines 1a and 1c (attach detailed explanation)	1e	0.
2	Acquisition indebtedness applicable to line 1 assets	2	0.
3	Subtract line 2 from line 1d	3	32,840,965.
4	Cash deemed held for charitable activities. Enter 1 1/2% of line 3 (for greater amount, see instructions)	4	492,614.
5	Net value of noncharitable-use assets. Subtract line 4 from line 3. Enter here and on Part V, line 4	5	32,348,351.
6	Minimum investment return. Enter 5% of line 5	6	1,617,418.

Part XI Distributable Amount (see instructions) (Section 4942(j)(3) and (j)(5) private operating foundations and certain foreign organizations, check here and do not complete this part.)

1	Minimum investment return from Part X, line 6	1	1,617,418.
2a	Tax on investment income for 2020 from Part VI, line 5	2a	779,207.
b	Income tax for 2020. (This does not include the tax from Part VI.)	2b	
c	Add lines 2a and 2b	2c	779,207.
3	Distributable amount before adjustments. Subtract line 2c from line 1	3	838,211.
4	Recoveries of amounts treated as qualifying distributions	4	0.
5	Add lines 3 and 4	5	838,211.
6	Deduction from distributable amount (see instructions)	6	0.
7	Distributable amount as adjusted. Subtract line 6 from line 5. Enter here and on Part XIII, line 1	7	838,211.

Part XII Qualifying Distributions (see instructions)

1 Amounts paid (including administrative expenses) to accomplish charitable, etc., purposes:			
a	Expenses, contributions, gifts, etc. - total from Part I, column (d), line 26	1a	48,968,747.
b	Program-related investments - total from Part IX-B	1b	1,715,488.
2	Amounts paid to acquire assets used (or held for use) directly in carrying out charitable, etc., purposes	2	
3	Amounts set aside for specific charitable projects that satisfy the:		
a	Suitability test (prior IRS approval required)	3a	
b	Cash distribution test (attach the required schedule)	3b	
4	Qualifying distributions. Add lines 1a through 3b. Enter here and on Part V, line 8; and Part XIII, line 4	4	50,684,235.
5	Foundations that qualify under section 4940(e) for the reduced rate of tax on net investment income. Enter 1% of Part I, line 27b	5	0.
6	Adjusted qualifying distributions. Subtract line 5 from line 4	6	50,684,235.

Note: The amount on line 6 will be used in Part V, column (b), in subsequent years when calculating whether the foundation qualifies for the section 4940(e) reduction of tax in those years.

Part XIII Undistributed Income (see instructions)

	(a) Corpus	(b) Years prior to 2019	(c) 2019	(d) 2020
1 Distributable amount for 2020 from Part XI, line 7				838,211.
2 Undistributed income, if any, as of the end of 2020:				
a Enter amount for 2019 only			1,591,244.	
b Total for prior years:		0.		
3 Excess distributions carryover, if any, to 2020:				
a From 2015				
b From 2016				
c From 2017				
d From 2018				
e From 2019				
f Total of lines 3a through e	0.			
4 Qualifying distributions for 2020 from Part XII, line 4: ▶ \$ 50,684,235.				
a Applied to 2019, but not more than line 2a			1,591,244.	
b Applied to undistributed income of prior years (Election required - see instructions)		0.		
c Treated as distributions out of corpus (Election required - see instructions)	0.			
d Applied to 2020 distributable amount				838,211.
e Remaining amount distributed out of corpus	48,254,780.			
5 Excess distributions carryover applied to 2020 (If an amount appears in column (d), the same amount must be shown in column (a).)	0.			0.
6 Enter the net total of each column as indicated below:				
a Corpus. Add lines 3f, 4c, and 4e. Subtract line 5	48,254,780.			
b Prior years' undistributed income. Subtract line 4b from line 2b		0.		
c Enter the amount of prior years' undistributed income for which a notice of deficiency has been issued, or on which the section 4942(a) tax has been previously assessed		0.		
d Subtract line 6c from line 6b. Taxable amount - see instructions		0.		
e Undistributed income for 2019. Subtract line 4a from line 2a. Taxable amount - see instr.			0.	
f Undistributed income for 2020. Subtract lines 4d and 5 from line 1. This amount must be distributed in 2021				0.
7 Amounts treated as distributions out of corpus to satisfy requirements imposed by section 170(b)(1)(F) or 4942(g)(3) (Election may be required - see instructions)	0.			
8 Excess distributions carryover from 2015 not applied on line 5 or line 7	0.			
9 Excess distributions carryover to 2021. Subtract lines 7 and 8 from line 6a	48,254,780.			
10 Analysis of line 9:				
a Excess from 2016				
b Excess from 2017				
c Excess from 2018				
d Excess from 2019				
e Excess from 2020	48,254,780.			

Part XIV Private Operating Foundations (see instructions and Part VII-A, question 9) N/A

1 a If the foundation has received a ruling or determination letter that it is a private operating foundation, and the ruling is effective for 2020, enter the date of the ruling ▶

b Check box to indicate whether the foundation is a private operating foundation described in section 4942(j)(3) or 4942(j)(5)

	Tax year				(e) Total
	(a) 2020	(b) 2019	(c) 2018	(d) 2017	
2 a Enter the lesser of the adjusted net income from Part I or the minimum investment return from Part X for each year listed					
b 85% of line 2a					
c Qualifying distributions from Part XII, line 4, for each year listed					
d Amounts included in line 2c not used directly for active conduct of exempt activities					
e Qualifying distributions made directly for active conduct of exempt activities. Subtract line 2d from line 2c					
3 Complete 3a, b, or c for the alternative test relied upon:					
a "Assets" alternative test - enter:					
(1) Value of all assets					
(2) Value of assets qualifying under section 4942(j)(3)(B)(i)					
b "Endowment" alternative test - enter 2/3 of minimum investment return shown in Part X, line 6, for each year listed					
c "Support" alternative test - enter:					
(1) Total support other than gross investment income (interest, dividends, rents, payments on securities loans (section 512(a)(5)), or royalties)					
(2) Support from general public and 5 or more exempt organizations as provided in section 4942(j)(3)(B)(iii)					
(3) Largest amount of support from an exempt organization					
(4) Gross investment income					

Part XV Supplementary Information (Complete this part only if the foundation had \$5,000 or more in assets at any time during the year-see instructions.)

1 **Information Regarding Foundation Managers:**

a List any managers of the foundation who have contributed more than 2% of the total contributions received by the foundation before the close of any tax year (but only if they have contributed more than \$5,000). (See section 507(d)(2).)

Pierre Omidyar

b List any managers of the foundation who own 10% or more of the stock of a corporation (or an equally large portion of the ownership of a partnership or other entity) of which the foundation has a 10% or greater interest.

None

2 **Information Regarding Contribution, Grant, Gift, Loan, Scholarship, etc., Programs:**

Check here if the foundation only makes contributions to preselected charitable organizations and does not accept unsolicited requests for funds. If the foundation makes gifts, grants, etc., to individuals or organizations under other conditions, complete items 2a, b, c, and d.

a The name, address, and telephone number or email address of the person to whom applications should be addressed:

b The form in which applications should be submitted and information and materials they should include:

c Any submission deadlines:

d Any restrictions or limitations on awards, such as by geographical areas, charitable fields, kinds of institutions, or other factors:

Part XV Supplementary Information (continued)

3 Grants and Contributions Paid During the Year or Approved for Future Payment				
Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution **	Amount
a Paid during the year				
Abraji - Associao Brasileira de Jornalismo Investigativo Rua Baro de Itapetininga 88 So Paulo, BRAZIL 01042-001	N/A	IRC 501(c)(3)	Support to improve Brazilian journalism and defending freedom of expression.	130,000.
Access Now 463 Lincoln Place #241 Brooklyn, NY 11238	N/A	IRC 501(c)(3)	General support grant for work in Central & Eastern Europe.	550,000.
Accountability Counsel 244 Kearny Street, Floor 6 San Francisco, CA 94108	N/A	IRC 501(c)(3)	Support for the human rights and enviornment voices of communities.	270,000.
Africa Check SA 12th floor University Corner, Cnr Jorissen and Bertha Streets, Johannesburg, SOUTH AFRICA 2000	N/A	IRC 501(c)(3)	Support to expand impact in South Africa, Nigeria, and Kenya.	625,000.
amaBhungane Community House, 41 Salt River Road, Salt River Cape Town, Western Cape, SOUTH AFRICA 7925	N/A	IRC 501(c)(3)	General support to promote free and capable media	125,000.
Total See continuation sheet(s) ▶ 3a				48,968,747.
b Approved for future payment				
Access Now 463 Lincoln Place #241 Brooklyn, NY 11238	N/A	IRC 501(c)(3)	General support grant for work in Central & Eastern Europe.	550,000.
Africa Check SA 12th floor University Corner, Cnr Jorissen and Bertha Streets Johannesburg, SOUTH AFRICA 2000	N/A	IRC 501(c)(3)	Support to expand impact in South Africa, Nigeria, and Kenya.	225,000.
amaBhungane Community House, 41 Salt River Road, Salt River Cape Town, Western Cape, SOUTH AFRICA 7925	N/A	IRC 501(c)(3)	General support to promote free and capable media	650,000.
Total See continuation sheet(s) ▶ 3b				22,153,333.

Luminate Foundation, Inc.

Part IV Capital Gains and Losses for Tax on Investment Income

(a) List and describe the kind(s) of property sold, e.g., real estate, 2-story brick warehouse; or common stock, 200 shs. MLC Co.	(b) How acquired P - Purchase D - Donation	(c) Date acquired (mo., day, yr.)	(d) Date sold (mo., day, yr.)
1a 25,000 shares eBay Inc	D	05/20/96	02/14/20
b 25,000 shares eBay Inc	D	05/20/96	02/18/20
c 104,125 shares eBay Inc	D	05/20/96	12/08/20
d 104,125 shares eBay Inc	D	05/20/96	12/09/20
e 104,125 shares PayPal Holdings Inc.	D	05/20/96	11/24/20
f 104,125 shares PayPal Holdings Inc.	D	05/20/96	11/25/20
g			
h			
i			
j			
k			
l			
m			
n			
o			

(e) Gross sales price	(f) Depreciation allowed (or allowable)	(g) Cost or other basis plus expense of sale	(h) Gain or (loss) (e) plus (f) minus (g)
a 951,212.		1.	951,211.
b 953,130.			953,130.
c 5,176,027.		2.	5,176,025.
d 5,175,402.		2.	5,175,400.
e 21,376,009.		2.	21,376,007.
f 22,103,253.		2.	22,103,251.
g			
h			
i			
j			
k			
l			
m			
n			
o			

Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69			(l) Losses (from col. (h)) Gains (excess of col. (h) gain over col. (k), but not less than "-0-")
(i) F.M.V. as of 12/31/69	(j) Adjusted basis as of 12/31/69	(k) Excess of col. (i) over col. (j), if any	
a			951,211.
b			953,130.
c			5,176,025.
d			5,175,400.
e			21,376,007.
f			22,103,251.
g			
h			
i			
j			
k			
l			
m			
n			
o			

2 Capital gain net income or (net capital loss) { If gain, also enter in Part I, line 7 If (loss), enter "-0-" in Part I, line 7 }	2	55,735,024.
3 Net short-term capital gain or (loss) as defined in sections 1222(5) and (6): If gain, also enter in Part I, line 8, column (c). If (loss), enter "-0-" in Part I, line 8	3	0.

Part XV Supplementary Information**3 Grants and Contributions Paid During the Year (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Amalgamated Foundation 1825 K Street NW Washington, DC 20006	N/A	IRC 501(c)(3)	Program support for Foundations' Families and Workers Fund.	1,000,000.
amandla.mobi Park 33 Hoofd Street Forum IV Lower Ground Floor Johannesburg, Gauteng, SOUTH AFRICA 2001	N/A	IRC 501(c)(3)	Support to promote just society and take co-ordinated, strategic action.	200,000.
American Immigration Council 1331 G St. NW, Suite 200 Washington, DC 20005	N/A	IRC 501(c)(3)	Program support for operations and goals of Justice Campaign.	500,000.
American University 4400 Massachusetts Avenue NW Washington, DC 20016-8017	N/A	IRC 501(c)(3)	Program support for Yes, and... Laughter Lab and Comedy initiatives	250,000.
Amnesty International 1 Easton Street London, UNITED KINGDOM WC1X 0DW	N/A	IRC 501(c)(3)	Support for disrupting the surveillance-based business models of tech companies.	100,000.
Anti-Defamation League 605 3rd Avenue New York, NY 10158-3560	N/A	IRC 501(c)(3)	Support to advance ADL's mission of fighting anti-Semitism and hate	20,000.
Asylum Access 555 12th St, 5th Floor Oakland, CA 94607	N/A	IRC 501(c)(3)	Support to transform the refugee system, rights and access.	200,000.
Atlantic Council 1030 15th St NW, 12th Floor Washington, DC 20005	N/A	IRC 501(c)(3)	Support research and understand misinformation flows in Nigeria.	45,000.
Avina Americas 1875 Street NW 5th Floor PMB500104 Washington, DC 20006	N/A	IRC 501(c)(3)	Support for campaigns to protect civic space and democratic governance.	1,520,000.
Betterplace Lab Paul-Lincke-Ufer 21 Berlin, GERMANY 10999	N/A	IRC 501(c)(3)	Program support to foster healthy and productive collaboration in Germany.	90,000.
Total from continuation sheets				47,268,747.

Part XV Supplementary Information**3 Grants and Contributions Paid During the Year (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Black Stripe Foundation 63 Craighall Road Victory Park Johannesburg, SOUTH AFRICA 2195	N/A	IRC 501(c)(3)	Support for public engagements in discussions and accountability.	200,000.
BudgIT 294 Herbert Macaulay Way, Sabo Yaba Lagos, NIGERIA 101245	N/A	IRC 501(c)(3)	Support for civic engagement, service delivery, and transparency in Nigeria.	475,000.
California Immigrant Policy Center (CIPC) 634 S Spring St Los Angeles, CA 90014	N/A	IRC 501(c)(3)	Program support for Immigration Strategic Messaging Project.	20,000.
Campaign Bootcamp 27 Dingley Place London, UNITED KINGDOM EC1V 8BR	N/A	IRC 501(c)(3)	Program support to provide skills, confidence to run effective campaigns.	500,000.
Center for Cultural Power 2150 Allston Way, Ste. 360 Berkeley, CA 94704	N/A	IRC 501(c)(3)	Support to women of color for an equitable world	75,000.
Center for Democracy, Development and the Rule of Law (CDDRL) 616 Serra Street, Stanford University Stanford, CA 94305	N/A	IRC 501(c)(3)	To support ONLF, LAD, and Ukrainian Emerging Leaders Programs.	337,147.
Center for New American Security (CNAS) 1152 15TH ST NW STE 950 WASHINGTON, DC 20005-1740	N/A	IRC 501(c)(3)	Program support for Transatlantic Security programme.	157,477.
Centre UA Gonchara Street 36 A 2nd floor 3 Office Kyiv, UKRAINE 1054	N/A	IRC 501(c)(3)	To enhance European quality of politics and freedom of speech.	195,000.
Civic Hall Labs 118 West 22nd Street, 12th Floor New York City, NY 10011	N/A	IRC 501(c)(3)	Program support to transition from physical space to virtual community.	150,000.
Code for America (CfA) 155 9th Street San Francisco, CA 94103	N/A	IRC 501(c)(3)	Program support towards a government in the digital age.	2,000,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Paid During the Year (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Color of Change Education Fund 1714 Franklin St Oakland, CA 94612	N/A	IRC 501(c)(3)	Program support for narratives about criminal justice in marginalised communities	750,000.
Conectas Avenida Paulista 575 So Paulo, BRAZIL 01311-000	N/A	IRC 501(c)(3)	Program support in the defense of Brazilian civic space	1,000,000.
Connected Development (CODE) Bassan Plaza, 2nd Floor F Wing, 10th Street Abuja, NIGERIA 900120	N/A	IRC 501(c)(3)	Program support to empower citizens in Nigeria on public spending.	200,000.
Co-op Foundation 1 Angel Square Manchester, UNITED KINGDOM M60 0AG	N/A	IRC 501(c)(3)	Program support to digital social enterprises and an events programme.	235,000.
Correctiv Huyssenallee11 Essen, GERMANY 45128	N/A	IRC 501(c)(3)	Program support to investigate Germany's injustices and abuses of power.	500,000.
Data and Society Research Institute 228 Park Ave S PMB 83075 New York, NY 10003-1502	N/A	IRC 501(c)(3)	Support for social and cultural issues arising from technological development.	1,500,000.
Define American 822 E. Broadway Louisville, KY 40204	N/A	IRC 501(c)(3)	Program support for US's authentic narratives about immigrants and refugee.	210,000.
Democracy Club 48 St Marks Road Bristol, UNITED KINGDOM BS50LR	N/A	IRC 501(c)(3)	Program support to UK's everyones participation in democratic life.	100,000.
Democracy Works 20 Jay St #840 Brooklyn, NY 11201	N/A	IRC 501(c)(3)	Support to serve under-reached voter population via voter engagement tools.	250,000.
Digital Freedom Fund (DFF) Nieuwezijds Voorburgwal 104 - 108 NETHERLANDS 1012 SG Amsterdam	N/A	IRC 501(c)(3)	Program support to advance Europe's digital rights through strategic litigation.	200,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Paid During the Year (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Directorio Legislativo Avenida Entre Ros 258 (3E) Buenos Aires, ARGENTINA C1079BP	N/A	IRC 501(c)(3)	Program support on anti-corruption and transparency field in Latin America.	100,000.
East West Management Institute 575 Madison Avenue, 25th Floor New York, NY 10022	N/A	IRC 501(c)(3)	Support strengthening Freedom of Expression civil society organizations in Malaysia.	375,000.
Engage Media 225 Bourke Street Melbourne, AUSTRALIA 3000	N/A	IRC 501(c)(3)	Support strengthening the data and digital rights in Southeast Asia	200,000.
European Digital Rights (EDRI) 12 Rue Belliard Brussels, BELGIUM 1040	N/A	IRC 501(c)(3)	Support to Europeans defending rights and freedoms in digital environment.	350,000.
European Press Prize Kleine-Gartmanplantsoen 10 Amsterdam, NETHERLANDS 1017 RR	N/A	IRC 501(c)(3)	Core funding to support capacity and operations.	60,000.
Fast Forward 1014 Torney Avenue, Suite 202 San Francisco, CA 94129	N/A	IRC 501(c)(3)	Program support civic tech startup Raheem.ai, Project.	50,000.
Finance Uncovered Unit 307, The Pill Box, 115 Coventry Road London, UNITED KINGDOM E2 6GG	N/A	IRC 501(c)(3)	Program support to global Investigative Journalism Network.	150,000.
Financial Transparency Coalition (FTC) 80 South Street 700 Boston, MA 02111	N/A	IRC 501(c)(3)	Program support to promote transparent, accountable, and sustainable financial system	450,000.
Foxglove Legal Community Interest Company International House, 24 Holborn Viaduct London, UNITED KINGDOM EC1A 2BN	N/A	IRC 501(c)(3)	General operating support	150,000.
Freedom Voices Network 5 Rue de Charonne Paris, FRANCE 75011	N/A	IRC 501(c)(3)	Program support to Forbidden Films to expand their work	350,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Paid During the Year (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Full Fact 2 Carlton Gardens, St. James's London, UNITED KINGDOM SW1Y 5AA	N/A	IRC 501(c)(3)	Program support to UK's leading independent fact checking charity.	475,000.
Fund for Constitutional Government 122 Maryland Avenue NE Washington, DC 20002	N/A	IRC 501(c)(3)	Program support for the Anti-Corruption Data Collective project	100,000.
Fund for Global Human Rights 1301 Connecticut Avenue, NW, Suite 400 Washington, DC 20036	N/A	IRC 501(c)(3)	Program support to enable activists to remain agile during crackdowns	380,000.
Fund for the City of New York 121 Avenue of the Americas, 6th Floor New York, NY 10013-1590	N/A	IRC 501(c)(3)	Program support to provide partner support to Open Data Charter.	9,500.
Fundacin Mi Sangre (FMS) Transversal 5 A no 45-64 Medellin, COLOMBIA	N/A	IRC 501(c)(3)	General operating support	133,563.
Fuse Corps The Presidio Institute 1202 Ralston Avenue Suite 1B San Francisco, CA 94129	N/A	IRC 501(c)(3)	Support to increase participation of experienced leaders within local governments	1,000,000.
Georgetown University 37th and O Streets, NW Washington, DC 20057	N/A	IRC 501(c)(3)	General operating support	320,000.
GFF (Gesellschaft fr Freiheitsrechte) Hessische Str. 10 Berlin, GERMANY 10115	N/A	IRC 501(c)(3)	Support human and civil rights litigation in Germany and Europe.	150,000.
Global Disinformation Index 4 Emmanuel Court Reddicroft Sutton Coldfield West Midlands, UNITED KINGDOM B73 6AZ	N/A	IRC 501(c)(3)	Program support to disrupt, defund and down-rank disinformation sites.	400,000.
Global Witness 1 Mark Square London, UNITED KINGDOM EC2A 4EG	N/A	IRC 501(c)(3)	General operating support	1,353,333.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Paid During the Year (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
GoLocal 38 Shota Rustaveli Street, Office 12 Kyiv, UKRAINE 01033	N/A	IRC 501(c)(3)	Program support to incubate fundraising for digital rights in Ukraine.	265,000.
Human Dignity Trust 4th Floor West - Quality House 5-9 Quality Court, Chancery Lane London, UNITED KINGDOM WC2A 1HP	N/A	IRC 501(c)(3)	Support decriminalisation of LGBT through strategic litigation and legislative reform.	205,000.
IDFI 20, T. Shevchenko Street Tbilisi, GEORGIA 0108	N/A	IRC 501(c)(3)	Program support for 3G project: Good Governance for Georgia.	130,000.
Iniciativa Latinoamericana por los Datos Abiertos (ILDA) Rincon 477/803 Montevideo, URUGUAY 11000	N/A	IRC 501(c)(3)	This is a core grant to support ILDA expand its work on open data through applied research, experimental	173,738.
Institute for Strategy and Policy B-1, Aung Chan Thar Street 1, Aung Myay Tharzi Housing Estate, Kamaryut Yangon, BURMA 11231	N/A	IRC 501(c)(3)	Program support for public outreach programmes.	150,000.
Instituto de Tecnologia e Sociedade do Rio de Janeiro (ITS) Rua da Assembleia 10, sala 4011 Rio de Janeiro, BRAZIL 20011901	N/A	IRC 501(c)(3)	Support democracy and technology, algorithmic accountability, disinformation, and	300,000.
Instituto Vladimir Herzog R. Duartina, 283 - Sumar So Paulo, BRAZIL 01256030	N/A	IRC 501(c)(3)	Support defending Democracy values, Human Rights and Freedom of Expression.	100,000.
International Budget Partnership (IBP) 750 First Street NE, Suite 700 Washington, DC 20002	N/A	IRC 501(c)(3)	Program support in addressing challenges in fiscal transparency and participation.	613,000.
International Center for Journalists (ICFJ) 2000 M Street NW, Suite 250 Washington, DC 20036	N/A	IRC 501(c)(3)	Support capacity building and financing non-profit media organizations in LatAm.	642,000.
International Lawyers Project (ILP) Exchange House 12 Primrose Street London, UNITED KINGDOM EC2A 2EG	N/A	IRC 501(c)(3)	Support local actors on economic inequality issues.	18,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Paid During the Year (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
International Women's Media Foundation 1625 K Street NW, Suite 1275 Washington, DC 20006	N/A	IRC 501(c)(3)	Program support for preventive cybersecurity programme and evaluation	300,000.
InternetLab Av. ipiranga 344 Cj. 11B Sao Paulo, BRAZIL 01046-010	N/A	IRC 501(c)(3)	Support advancing technology policy and human rights in digital environment.	120,000.
Journalism Development Network 4401 Connecticut Avenue Northwest #321 Washington, DC 20008	N/A	IRC 501(c)(3)	Funding to diversify revenue, build capacity, and strengthen audience engagement.	400,000.
Katiba Institute House No.5, The Crescent, Off Parklands Road, P.O. Box 26586 Nairobi, KENYA 00100	N/A	IRC 501(c)(3)	Support Kenyan constitution as an instrument to achieve just society.	300,000.
King Baudouin Foundation US 10 Rockefeller Plaza 16th Floor New York, NY 10020	N/A	IRC 501(c)(3)	Support sustainability, developing business model and audience related processes.	190,900.
Kyiv Smart City Glushkova avenue 1, Pavilion 5 Kyiv, UKRAINE 3680	N/A	IRC 501(c)(3)	Program Support for fundraising strategy and presentational materials.	38,000.
Liberty 26-30 Strutton Ground London, UNITED KINGDOM SW1P 2HR	N/A	IRC 501(c)(3)	Support expanding organisation's capability, privacy, surveillance, and data protection.	374,050.
Media Development Investment Fund (MDIF) 37 West 20th Street Suite 804 New York, NY 10011	N/A	IRC 501(c)(3)	Program support for global independent media organisations.	846,608.
Media Legal Defence Initiative (MLDI) 17 Oval Way, Vauxhall London, UNITED KINGDOM SE11 5RR	N/A	IRC 501(c)(3)	General operating support	400,000.
Media Monitoring Africa Suite no.2, 22 Art Centre 6th Street Parkhurst Johannesburg, Gauteng, SOUTH AFRICA 2193	N/A	IRC 501(c)(3)	Program support to promote ethical and fair journalism.	165,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Paid During the Year (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
MediaJustice 436 14th St, Suite 500 Oakland, CA 94612	N/A	IRC 501(c)(3)	Support intersection of data and digital rights and racial justice	250,000.
Mozilla Foundation 331 E. Evelyn Avenue Mountain View, CA 94041	N/A	IRC 501(c)(3)	Support quantifying the harms of surveillance capitalism project.	500,000.
Namati 1824 Jefferson Place, NW Washington, DC 20036	N/A	IRC 501(c)(3)	Program support for the Right to Citizenship.	207,440.
National Conference on Citizenship 1920 L Street, NW Suite 450 Washington, DC 20036	N/A	IRC 501(c)(3)	Program support for Public Data Integrity project.	200,000.
Natural Resource Governance Institute (NRGI) 80 Broad Street, Suite 1801 New York, NY 10004	N/A	IRC 501(c)(3)	General operating support	775,000.
Neo Philanthropy 45 W 36th St, 6th Floor New York, NY 10018	N/A	IRC 501(c)(3)	Support full integration of immigrants as active participants in democracy.	1,000,000.
Network of European Foundations Philanthropy House Rue Royale, 94 Brussels, BELGIUM 1000	N/A	IRC 501(c)(3)	Program support Fund for Solidarity and Democracy in Europe.	975,000.
New America Foundation (NAF) 740 15th St. NW Washington, DC 20005	N/A	IRC 501(c)(3)	Program support to support the Ranking Digital Rights project.	25,000.
New Venture Fund 1201 Connecticut Ave. NW, Suite 300 Washington, DC 20036	N/A	IRC 501(c)(3)	Support to identify and mitigate technology-based vulnerabilities for impending elections.	200,000.
Nossas Rua Visconde de Silva 21 Rio de Janeiro, BRAZIL 22271-091	N/A	IRC 501(c)(3)	Support scaling and refining their Civic Empowerment model.	300,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Paid During the Year (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Nuffield Foundation 28 Bedford Square London, UNITED KINGDOM WC1B 3JS	N/A	IRC 501(c)(3)	Support responsive work on COVID-19 and technology, and international engagement.	170,000.
Open Cities Lab 153a Helen Josphe Road, Glenwood Durban, SOUTH AFRICA 4001	N/A	IRC 501(c)(3)	Support open data, open government, and civic technology through projects	80,000.
Open Collective Foundation 340 S. Lemon Ave, No. 3717 Walnut, CA 91789	N/A	IRC 501(c)(3)	Support internet freedom projects through the "Internet Freedom Support Fund"	275,000.
Open Contracting Partnership Open Gov Hub 1110 Vermont Ave NW #500 Washington, DC 20005	N/A	IRC 501(c)(3)	Program support to make public procurement more transparent and effective.	700,000.
Open Data Institute (ODI) 3rd Floor 65 Clifton Street London, UNITED KINGDOM EC2A 4JE	N/A	IRC 501(c)(3)	Program support to Data Institutions, Data Skills, and Data Assurance / Governance.	1,300,000.
Open Government Partnership (OGP) 1100 13th St. NW, Suite 800 Washington, DC 20005	N/A	IRC 501(c)(3)	Support domestic reformers making governments open, accountable, and responsive.	1,500,000.
Open Institute 209 State House Road Nairobi, KENYA 100	N/A	IRC 501(c)(3)	Program support for Active Citizen Data and Government Responsiveness programmes.	182,000.
Open Knowledge Foundation Germany Singer Str. 109 Berlin, GERMANY 10179	N/A	IRC 501(c)(3)	Program support for dissemination of free and openly accessible knowledge.	325,000.
Open Secrets Community House 41 Salt River Road Salt River Cape Town, Western Cape, SOUTH AFRICA 7925	N/A	IRC 501(c)(3)	General operating support for investigations and litigation against economic crimes.	257,500.
openDemocracy The Print House, 18 Ashwin Street London, UNITED KINGDOM E8 3DL	N/A	IRC 501(c)(3)	Program support for investigative output.	320,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Paid During the Year (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
OpenUp Campground Rd (entrance via Hemlock St.), Claremont Cape Town, SOUTH AFRICA 7708	N/A	IRC 501(c)(3)	Support local municipalities narrowing the gap between government and citizens.	400,000.
Outriders Tomasza Nocznickiego 23/69 Warszawa, POLAND 01-948	N/A	IRC 501(c)(3)	General operating support	150,000.
Paradigm Leadership Support Initiative (PLSI) Suites 23/24 Fundex Building, Off Kenneth Dike Way, Bodiya-Ashi Road Ibadan, NIGERIA 200132	N/A	IRC 501(c)(3)	Support promoting citizens active participation in the Nigerian public audit	125,000.
Paris Peace Forum 164 rue de Vaugirard Paris, FRANCE 75015	N/A	IRC 501(c)(3)	Support stakeholders for collective action and resources to governance projects.	455,000.
Partnership on AI 115 Sansome St, Ste 1200 San Francisco, CA 94104	N/A	IRC 501(c)(3)	Support to provide open inclusive platform for discussion and engagement	300,000.
Phandeeyar 340 S Lemon Ave #9595 Walnut, CA 91789	N/A	IRC 501(c)(3)	Support Myanmar's generation of tech entrepreneurs and helping change agents	400,000.
Platform to Protect Whistleblowers in Africa (PPLAAF) 156 rue de Rivoli Paris, FRANCE 75001	N/A	IRC 501(c)(3)	Program support to whistleblowers, and conducts strategic litigation and advocacy	140,000.
PODER Durango 1, Colonia Roma Norte Mexico City, MEXICO 6100	N/A	IRC 501(c)(3)	Support accountability, whistleblowing promotion, and data and investigative	175,000.
Privacy International (PI) 62 Britton Street London, UNITED KINGDOM EC1M 5UY	N/A	IRC 501(c)(3)	Support advocating for the right to privacy for everyone, everywhere	800,000.
Project on Government Oversight (POGO) 1100 G Street NW Suite 500 Washington, DC 20005-3806	N/A	IRC 501(c)(3)	Support reform and improve the audit system in the US	75,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Paid During the Year (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Proteus Fund 15 Research Drive, Suite B Amherst, MA 01002	N/A	IRC 501(c)(3)	Program support for effective grantmaking by the participating donors.	150,000.
Public and Private Development Centre (PPDC) Plot 184 Cadastral Zone A6, Ademola Adetokunbo Crescent Wuse 2 (SCCN House) Abuja, NIGERIA 23409	N/A	IRC 501(c)(3)	Supporting Nigerian government usage of Open Contracting information for accountability.	300,000.
Public Citizen 1600 20th Street Northwest Washington, DC 20009	N/A	IRC 501(c)(3)	Program support for Digital Trade Alliance project at Public Citizen.	200,000.
Publish What You Pay (PWYP) TOG, Room 3.01, 3rd Floor, 201 Borough High Street London, UNITED KINGDOM SE1 1JA	N/A	IRC 501(c)(3)	Program support for international secretariat.	400,000.
Race Forward 150 Broadway, Suite 303 New York, NY 10038	N/A	IRC 501(c)(3)	Support organizations creating and amplifying accurate and humanizing immigration	300,000.
Res Non Verba Thames 1024 Buenos Aires, ARGENTINA C1414DCV	N/A	IRC 501(c)(3)	Program support for multiple charitable purposes project	242,700.
Rhize Post Office Box 642 New York, NY 10113	N/A	IRC 501(c)(3)	Support marginalised groups and communities people-powered movements.	150,000.
Right2Know 107 Community House 41 Salt River Rd Salt River Cape Town, Western Cape, SOUTH AFRICA 7925	N/A	IRC 501(c)(3)	Support public awareness, mobilising communities, and research and targeted advocacy	120,000.
Rockefeller Philanthropy Advisors (RPA) 6 West 48th Street, 10th Floor New York, NY 10036	N/A	IRC 501(c)(3)	Support for AfricaNoFilter and International Fund for Public Interest Media.	550,000.
Socio-Economic Rights and Accountability Project (SERAP) 2B Oyetola Street, Off Ajanaku Street, Off Salvation Street, Opebi Lagos, NIGERIA 101233	N/A	IRC 501(c)(3)	Program support to promotes transparency and accountability in Nigeria	80,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Paid During the Year (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Stiftung Neue Verantwortung (SNV) Beisheim Center Berliner Freiheit 2 Berlin, GERMANY D-10785	N/A	IRC 501(c)(3)	General operating and research and policy development support	640,000.
Temblores ONG Calle 70 # 0 - 32, Apartment 302 Bogota, COLOMBIA	N/A	IRC 501(c)(3)	Support to increase visibility of systematic Colombia's police violence	40,000.
The Accountability Lab OpenGov Hub: 1110 Vermont Avenue NW, Suite 500 Washington, DC 20005	N/A	IRC 501(c)(3)	Support programming, operations and learning in South Africa and Nigeria.	220,000.
The B Team 115 5th Avenue 6th Floor New York, NY 10003	N/A	IRC 501(c)(3)	Program support for Governance & Transparency programme.	325,000.
The Bureau of Investigative Journalism Zetland House, 5-25 Scrutton St London, UNITED KINGDOM EC2A 4HJ	N/A	IRC 501(c)(3)	General operating support	850,000.
The Democratic Society (Demsoc) 28 Fourth Avenue Hove, UNITED KINGDOM BN3 2PJ	N/A	IRC 501(c)(3)	Program support for the 'Public Square' project	150,000.
The Governance Lab NYU Tandon School of Engineering 2 MetroTech Center, 9th Floor Brooklyn, NY 11201	N/A	IRC 501(c)(3)	Program support for institutions and people to solve public problems.	55,000.
The London School of Economics and Political Science (LSE) Houghton Street, Holborn London, UNITED KINGDOM WC2A 2AE	N/A	IRC 501(c)(3)	Support or establish Justice, Equity and Technology Table (JETT)	75,000.
The Markup 900 Broadway, Suite 202 New York, NY 10003	N/A	IRC 501(c)(3)	General operating support	650,000.
The University of Oxford Development Trust University of Oxford, University Offices Wellington Square Oxford, UNITED KINGDOM OX1 2JD	N/A	IRC 501(c)(3)	Program support for the interaction of algorithms, automation, and politics.	614,543.
Total from continuation sheets				

Part XV Supplementary Information

3 Grants and Contributions Paid During the Year (Continuation)

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Tilburg University Warandelaan 2 Tilburg, NETHERLANDS 5037 AB	N/A	IRC 501(c)(3)	Program support for Global Data Justice research project	200,000.
Transparency International UK (TI-UK) 10 Queen Street Place London, UNITED KINGDOM EC4R 1BE	N/A	IRC 501(c)(3)	Program support for Grantee's Anti-Corruption Programme.	375,000.
United We Dream Network 1201 16th St NW Suite 714 Washington, DC 20036	N/A	IRC 501(c)(3)	Support justice and dignity for U.S. immigrants and all people.	1,150,000.
University of Johannesburg Auckland Park Kingsway Campus, 629, B-Ring Johannesburg, SOUTH AFRICA 2006	N/A	IRC 501(c)(3)	Program support for Media Policy and Democracy Project ("MPDP")	22,248.
Upturn 1015 15th St., NW, Suite 600 Washington, DC 20005	N/A	IRC 501(c)(3)	Support equitable digital technology in the design, governance, and usage.	250,000.
Washington Office on Latin America (WOLA) 1666 Connecticut Ave NW, Suite 400 Washington, DC 20009	N/A	IRC 501(c)(3)	Program support for campaigns in Latin America.	330,000.
Civic Hall Labs 118 West 22nd Street, 12th Floor New York, NY 10011	N/A	IRC 501(c)(3)	Program support to transition from physical space to virtual community.	1,000,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Approved for Future Payment (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Amnesty International 1 Easton Street London, UNITED KINGDOM WC1X 0DW	N/A	IRC 501(c)(3)	Support for disrupting the surveillance-based business models of tech companies.	100,000.
Asylum Access 555 12th St, 5th Floor Oakland, CA 94607	N/A	IRC 501(c)(3)	Support to transform the refugee system, rights and access.	200,000.
Black Stripe Foundation 63 Craighall Road Victory Park Johannesburg, SOUTH AFRICA 2195	N/A	IRC 501(c)(3)	Support for public engagements in discussions and accountability.	200,000.
Campaign Bootcamp 27 Dingley Place London, UNITED KINGDOM EC1V 8BR	N/A	IRC 501(c)(3)	Program support to provide skills, confidence to run effective campaigns.	500,000.
Centre UA Gonchara Street 36 A 2nd floor 3 Office Kyiv, UKRAINE 1054	N/A	IRC 501(c)(3)	To enhance European quality of politics and freedom of speech.	150,000.
Chequeado Avenida Crdoba 5869, Of. 7A Buenos Aires, ARGENTINA	N/A	IRC 501(c)(3)	Support in advancing its fact-checking efforts in Latin America through automation, content	200,000.
Code for America (CfA) 155 9th Street San Francisco, CA 94103	N/A	IRC 501(c)(3)	Program support towards a government in the digital age.	1,750,000.
Color of Change Education Fund 1714 Franklin St Oakland, CA 94612	N/A	IRC 501(c)(3)	Program support for narratives about criminal justice in marginalised communities	1,000,000.
Connected Development (CODE) Bassan Plaza, 2nd Floor F Wing, 10th Street Abuja, NIGERIA 900120	N/A	IRC 501(c)(3)	Program support to empower citizens in Nigeria on public spending.	100,000.
Correctiv Huyssenallee11 Essen, GERMANY 45128	N/A	IRC 501(c)(3)	Program support to investigate Germany's injustices and abuses of power.	500,000.
Total from continuation sheets				20,728,333.

Part XV Supplementary Information**3 Grants and Contributions Approved for Future Payment (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Data and Society Research Institute 228 Park Ave S PMB 83075 New York, NY 10003-1502	N/A	IRC 501(c)(3)	Support for social and cultural issues arising from technological development.	1,500,000.
East West Management Institute 575 Madison Avenue, 25th Floor New York, NY 10022	N/A	IRC 501(c)(3)	Support strengthening Freedom of Expression civil society organizations in Malaysia.	150,000.
European Press Prize Kleine-Gartmanplantsoen 10 Amsterdam, NETHERLANDS 1017 RR	N/A	IRC 501(c)(3)	Core funding to support capacity and operations.	60,000.
Foxglove International House, 24 Holborn Viaduct London, UNITED KINGDOM EC1A 2BN	N/A	IRC 501(c)(3)	General operating support	150,000.
Georgetown University - Center on Privacy and Technology 306 Reiss Building, 3700 O Street, N.W. Washington, DC 20057	N/A	IRC 501(c)(3)	Support research, advocacy, and capacity building efforts.	680,000.
GFF (Gesellschaft fr Freiheitsrechte) Hessische Str. 10 Berlin, GERMANY 10115	N/A	IRC 501(c)(3)	Support human and civil rights litigation in Germany and Europe.	150,000.
Global Witness 1 Mark Square London, UNITED KINGDOM EC2A 4EG	N/A	IRC 501(c)(3)	General operating support	1,333,333.
Human Dignity Trust 4th Floor West - Quality House 5-9 Quality Court, Chancery Lane London, UNITED KINGDOM WC2A 1HP	N/A	IRC 501(c)(3)	Support decriminalisation of LGBT through strategic litigation and legislative reform.	175,000.
IDFI 20, T. Shevchenko Street Tbilisi, GEORGIA 0108	N/A	IRC 501(c)(3)	Program support for 3G project: Good Governance for Georgia.	130,000.
Iniciativa Latinoamericana por los Datos Abiertos (ILDA) Rincon 477/803 Montevideo, URUGUAY 11000	N/A	IRC 501(c)(3)	This is a core grant to support ILDA expand its work on open data through applied research, experimental	150,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Approved for Future Payment (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Instituto de Tecnologia e Sociedade do Rio de Janeiro (ITS) Rua da Assembleia 10, sala 4011 Rio de Janeiro, BRAZIL 20011901	N/A	IRC 501(c)(3)	Support democracy and technology, algorithmic accountability, disinformation, and	300,000.
International Budget Partnership (IBP) 750 First Street NE, Suite 700 Washington, DC 20002	N/A	IRC 501(c)(3)	Program support in addressing challenges in fiscal transparency and participation.	250,000.
InternetLab Av. Ipiranga 344 Cj. 11B Sao Paulo, BRAZIL 01046-010	N/A	IRC 501(c)(3)	Support advancing technology policy and human rights in digital environment.	240,000.
Media Legal Defence Initiative (MLDI) 17 Oval Way, Vauxhall London, UNITED KINGDOM SE11 5RR	N/A	IRC 501(c)(3)	General operating support	200,000.
Media Monitoring Africa Suite no.2, 22 Art Centre 6th Street Parkhurst Johannesburg, Gauteng, SOUTH AFRICA 2193	N/A	IRC 501(c)(3)	Program support to promote ethical and fair journalism.	300,000.
MediaJustice 436 14th St, Suite 500 Oakland, CA 94612	N/A	IRC 501(c)(3)	Support intersection of data and digital rights and racial justice	500,000.
More in Common 115 Broadway St. Floor 7 New York, NY 10006	N/A	IRC 501(c)(3)	Support to build communities and societies that are more resilient to polarisation and	1,000,000.
Myanmar ICT for Development Organization (MIDO) No 20, Hteetan 1st Street, Kyimyindai Township Yangon, BURMA 11101	N/A	IRC 501(c)(3)	Support to explore ways to improve documentation and evidence gathering can empower civil society	150,000.
Natural Resource Governance Institute (NRGI) 80 Broad Street, Suite 1801 New York, NY 10004	N/A	IRC 501(c)(3)	General operating support	400,000.
Neo Philanthropy, Inc. 45 W 36th St, 6th Floor New York, NY 10018	N/A	IRC 501(c)(3)	General support towards full integration of immigrants as active participants in our	1,250,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Approved for Future Payment (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Nossas Rua Visconde de Silva 21 Rio de Janeiro, BRAZIL 22271-091	N/A	IRC 501(c)(3)	Support scaling and refining their Civic Empowerment model.	300,000.
Open Cities Lab 153a Helen Jospeh Road, Glenwood Durban, SOUTH AFRICA 4001	N/A	IRC 501(c)(3)	Support open data, open government, and civic technology through projects	80,000.
Open Contracting Partnership Open Gov Hub 1110 Vermont Ave NW #500 Washington, DC 20005	N/A	IRC 501(c)(3)	Program support to make public procurement more transparent and effective.	1,100,000.
Open Data Institute (ODI) 3rd Floor 65 Clifton Street London, UNITED KINGDOM EC2A 4JE	N/A	IRC 501(c)(3)	Program support to Data Institutions, Data Skills, and Data Assurance / Governance.	500,000.
Open Knowledge Foundation Germany Singer Str. 109 Berlin, GERMANY 10179	N/A	IRC 501(c)(3)	Program support for dissemination of free and openly accessible knowledge.	485,000.
Open Secrets Community House, 41 Salt River Road Salt River Cape Town, Western Cape, SOUTH AFRICA 7925	N/A	IRC 501(c)(3)	General operating support for investigations and litigation against economic crimes.	300,000.
OpenUp Campground Rd (entrance via Hemlock St.), Claremont Cape Town, SOUTH AFRICA 7708	N/A	IRC 501(c)(3)	Support local municipalities narrowing the gap between government and citizens.	250,000.
Paradigm Leadership Support Initiative (PLSI) Suites 23/24 Fundex Building, Off Kenneth Dike Way, Bodija-Ashi Road Ibadan, NIGERIA 200132	N/A	IRC 501(c)(3)	Support promoting citizens active participation in the Nigerian public audit	125,000.
Partnership on AI 115 Sansome St, Ste 1200 San Francisco, CA 94104	N/A	IRC 501(c)(3)	Support to provide open inclusive platform for discussion and engagement	200,000.
Platform to Protect Whistleblowers in Africa (PPLAAF) 156 rue de Rivoli Paris, FRANCE 75001	N/A	IRC 501(c)(3)	Program support to whistleblowers, and conducts strategic litigation and advocacy	140,000.
Total from continuation sheets				

Part XV Supplementary Information**3 Grants and Contributions Approved for Future Payment (Continuation)**

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Privacy International (PI) 62 Britton Street London, UNITED KINGDOM EC1M 5UY	N/A	IRC 501(c)(3)	Support advocating for the right to privacy for everyone, everywhere	1,350,000.
Public and Private Development Centre (PPDC) Plot 184 Cadastral Zone A6, Ademola Adetokunbo Crescent Wuse 2 (SCCN House) Abuja, NIGERIA 23409	N/A	IRC 501(c)(3)	Supporting Nigerian government usage of Open Contracting information for accountability.	150,000.
Publish What You Pay (PWYP) TOG, Room 3.01, 3rd Floor, 201 Borough High Street London, UNITED KINGDOM SE1 1JA	N/A	IRC 501(c)(3)	Program support for international secretariat.	600,000.
Res Non Verba Thames 1024 Buenos Aires, ARGENTINA C1414DCV	N/A	IRC 501(c)(3)	Program support for multiple charitable purposes project	200,000.
Socio-Economic Rights and Accountability Project (SERAP) 2B Oyetola Street, Off Ajanaku Street, Off Salvation Street, Opebi Lagos, NIGERIA 101233	N/A	IRC 501(c)(3)	Program support to promotes transparency and accountability in Nigeria	60,000.
The AI Now Institute NYU School of Law, 40 Washington Square South, Room 336 New York, NY 10012-1066	N/A	IRC 501(c)(3)	To support the understanding of social implications of artificial intelligence across	20,000.
The B Team 115 5th Avenue 6th Floor New York, NY 10003	N/A	IRC 501(c)(3)	Program support for Governance & Transparency programme.	450,000.
The Bureau of Investigative Journalism Zetland House, 5-25 Scrutton St London, UNITED KINGDOM EC2A 4HJ	N/A	IRC 501(c)(3)	General operating support	450,000.
Transparency International UK (TI-UK) 10 Queen Street Place London, UNITED KINGDOM EC4R 1BE	N/A	IRC 501(c)(3)	Program support for Grantee's Anti-Corruption Programme.	200,000.
Total from continuation sheets				

Part XV | **Supplementary Information**

3a Grants and Contributions Paid During the Year Continuation of Purpose of Grant or Contribution

Name of Recipient - Iniciativa Latinoamericana por los Datos Abiertos
(ILDA)

This is a core grant to support ILDA expand its work on open data through applied research, experimental pilots, and agenda building.

Name of Recipient - Instituto de Tecnologia e Sociedade do Rio de Janeiro
(ITS)

Support democracy and technology, algorithmic accountability, disinformation, and computational propaganda.

Name of Recipient - PODER

Support accountability, whistleblowing promotion, and data and investigative journalism.

Name of Recipient - Race Forward

Support organizations creating and amplifying accurate and humanizing immigration narratives.

Part XV Supplementary Information

3b Grants and Contributions Approved for Future Payment Continuation of Purpose of Grant or Contribution

Name of Recipient - Chequeado

Support in advancing its fact-checking efforts in Latin America through automation, content distribution, and data literacy programs.

Name of Recipient - Iniciativa Latinoamericana por los Datos Abiertos (ILDA)

This is a core grant to support ILDA expand its work on open data through applied research, experimental pilots, and agenda building.

Name of Recipient - Instituto de Tecnologia e Sociedade do Rio de Janeiro (ITS)

Support democracy and technology, algorithmic accountability, disinformation, and computational propaganda.

Name of Recipient - More in Common

Support to build communities and societies that are more resilient to polarisation and social division.

Name of Recipient - Myanmar ICT for Development Organization (MIDO)

Support to explore ways to improve documentation and evidence gathering can empower civil society - in Myanmar and the broader global south

Name of Recipient - Neo Philanthropy, Inc.

General support towards full integration of immigrants as active participants in our democracy.

Name of Recipient - The AI Now Institute

To support the understanding of social implications of artificial

Part XV | **Supplementary Information**

3b Grants and Contributions Approved for Future Payment Continuation of Purpose of Grant or Contribution

intelligence across four key domains: rights and liberties, labour and automation, bias and inclusion, and safety and critical infrastructure.

Schedule B

(Form 990, 990-EZ, or 990-PF)

Department of the Treasury
Internal Revenue Service

Schedule of Contributors

▶ Attach to Form 990, Form 990-EZ, or Form 990-PF.
▶ Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047

2020

Name of the organization

Luminate Foundation, Inc.

Employer identification number

82-3941326

Organization type (check one):

Filers of:

Section:

Form 990 or 990-EZ

501(c)() (enter number) organization

4947(a)(1) nonexempt charitable trust **not** treated as a private foundation

527 political organization

Form 990-PF

501(c)(3) exempt private foundation

4947(a)(1) nonexempt charitable trust treated as a private foundation

501(c)(3) taxable private foundation

Check if your organization is covered by the **General Rule** or a **Special Rule**.

Note: Only a section 501(c)(7), (8), or (10) organization can check boxes for both the General Rule and a Special Rule. See instructions.

General Rule

For an organization filing Form 990, 990-EZ, or 990-PF that received, during the year, contributions totaling \$5,000 or more (in money or property) from any one contributor. Complete Parts I and II. See instructions for determining a contributor's total contributions.

Special Rules

For an organization described in section 501(c)(3) filing Form 990 or 990-EZ that met the 33 1/3% support test of the regulations under sections 509(a)(1) and 170(b)(1)(A)(vi), that checked Schedule A (Form 990 or 990-EZ), Part II, line 13, 16a, or 16b, and that received from any one contributor, during the year, total contributions of the greater of **(1)** \$5,000; or **(2)** 2% of the amount on (i) Form 990, Part VIII, line 1h; or (ii) Form 990-EZ, line 1. Complete Parts I and II.

For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, total contributions of more than \$1,000 exclusively for religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals. Complete Parts I (entering "N/A" in column (b) instead of the contributor name and address), II, and III.

For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, contributions *exclusively* for religious, charitable, etc., purposes, but no such contributions totaled more than \$1,000. If this box is checked, enter here the total contributions that were received during the year for an *exclusively* religious, charitable, etc., purpose. Don't complete any of the parts unless the **General Rule** applies to this organization because it received *nonexclusively* religious, charitable, etc., contributions totaling \$5,000 or more during the year ▶ \$ _____

Caution: An organization that isn't covered by the General Rule and/or the Special Rules doesn't file Schedule B (Form 990, 990-EZ, or 990-PF), but it **must** answer "No" on Part IV, line 2, of its Form 990; or check the box on line H of its Form 990-EZ or on its Form 990-PF, Part I, line 2, to certify that it doesn't meet the filing requirements of Schedule B (Form 990, 990-EZ, or 990-PF).

Name of organization Luminate Foundation, Inc.	Employer identification number 82-3941326
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Part I Contributors (see instructions). Use duplicate copies of Part I if additional space is needed.

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
1	Pierre M Omidyar Trust 720 University Ave., Ste 200 Los Gatos, CA 95032	\$ 42,268,503.	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input checked="" type="checkbox"/> (Complete Part II for noncash contributions.)
2	Pierre M Omidyar Trust 720 University Ave., Ste 200 Los Gatos, CA 95032	\$ 10,508,295.	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input checked="" type="checkbox"/> (Complete Part II for noncash contributions.)
_____	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
_____	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
_____	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
_____	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

Name of organization Luminate Foundation, Inc.	Employer identification number 82-3941326
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Part II Noncash Property (see instructions). Use duplicate copies of Part II if additional space is needed.

(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
<u>1</u>	208,250 shares PYPL stock _____ _____ _____	\$ <u>42,268,503.</u>	<u>11/24/20</u>
<u>2</u>	208,250 shares EBAY stock _____ _____ _____	\$ <u>10,508,295.</u>	<u>12/07/20</u>
____	_____ _____ _____	\$ _____	_____
____	_____ _____ _____	\$ _____	_____
____	_____ _____ _____	\$ _____	_____
____	_____ _____ _____	\$ _____	_____

Name of organization Luminate Foundation, Inc.	Employer identification number 82-3941326
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Part III Exclusively religious, charitable, etc., contributions to organizations described in section 501(c)(7), (8), or (10) that total more than \$1,000 for the year from any one contributor. Complete columns (a) through (e) and the following line entry. For organizations completing Part III, enter the total of exclusively religious, charitable, etc., contributions of **\$1,000 or less** for the year. (Enter this info. once.) ▶ \$ _____
Use duplicate copies of Part III if additional space is needed.

(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	
(e) Transfer of gift			
Transferee's name, address, and ZIP + 4		Relationship of transferor to transferee	

Underpayment of Estimated Tax by Corporations

▶ Attach to the corporation's tax return. **Form 990-PF**

2020

▶ Go to www.irs.gov/Form2220 for instructions and the latest information.

Name **Luminate Foundation, Inc.** Employer identification number **82-3941326**

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

Part I Required Annual Payment

1	Total tax (see instructions)	1	779,207.
2a	Personal holding company tax (Schedule PH (Form 1120), line 26) included on line 1	2a	
2b	Look-back interest included on line 1 under section 460(b)(2) for completed long-term contracts or section 167(g) for depreciation under the income forecast method	2b	
2c	Credit for federal tax paid on fuels (see instructions)	2c	
2d	Total. Add lines 2a through 2c	2d	
3	Subtract line 2d from line 1. If the result is less than \$500, do not complete or file this form. The corporation does not owe the penalty	3	779,207.
4	Enter the tax shown on the corporation's 2019 income tax return. See instructions. Caution: If the tax is zero or the tax year was for less than 12 months, skip this line and enter the amount from line 3 on line 5	4	59,638.
5	Required annual payment. Enter the smaller of line 3 or line 4. If the corporation is required to skip line 4, enter the amount from line 3	5	59,638.

Part II Reasons for Filing - Check the boxes below that apply. If any boxes are checked, the corporation **must** file Form 2220 even if it does not owe a penalty. See instructions.

- 6 The corporation is using the adjusted seasonal installment method.
- 7 The corporation is using the annualized income installment method.
- 8 The corporation is a "large corporation" figuring its first required installment based on the prior year's tax.

Part III Figuring the Underpayment

	(a)	(b)	(c)	(d)	
9 Installment due dates. Enter in columns (a) through (d) the 15th day of the 4th (Form 990-PF filers: Use 5th month), 6th, 9th, and 12th months of the corporation's tax year. Filers with installments due on or after April 1, 2020, and before July 15, 2020, see instructions	9	07/15/20	07/15/20	09/15/20	12/15/20
10 Required installments. If the box on line 6 and/or line 7 above is checked, enter the amounts from Sch A, line 38. If the box on line 8 (but not 6 or 7) is checked, see instructions for the amounts to enter. If none of these boxes are checked, enter 25% (0.25) of line 5 above in each column	10	13,392.	13,392.	13,392.	
11 Estimated tax paid or credited for each period. For column (a) only, enter the amount from line 11 on line 15. See instructions	11	748,585.			
Complete lines 12 through 18 of one column before going to the next column.					
12 Enter amount, if any, from line 18 of the preceding column	12		735,193.	721,801.	708,409.
13 Add lines 11 and 12	13		735,193.	721,801.	708,409.
14 Add amounts on lines 16 and 17 of the preceding column	14				
15 Subtract line 14 from line 13. If zero or less, enter -0-	15	748,585.	735,193.	721,801.	708,409.
16 If the amount on line 15 is zero, subtract line 13 from line 14. Otherwise, enter -0-	16		0.	0.	
17 Underpayment. If line 15 is less than or equal to line 10, subtract line 15 from line 10. Then go to line 12 of the next column. Otherwise, go to line 18	17				
18 Overpayment. If line 10 is less than line 15, subtract line 10 from line 15. Then go to line 12 of the next column	18	735,193.	721,801.	708,409.	

Go to Part IV on page 2 to figure the penalty. Do not go to Part IV if there are no entries on line 17 - no penalty is owed.

Part IV Figuring the Penalty

	(a)	(b)	(c)	(d)
19 Enter the date of payment or the 15th day of the 4th month after the close of the tax year, whichever is earlier. (C corporations with tax years ending June 30 and S corporations: Use 3rd month instead of 4th month. Form 990-PF and Form 990-T filers: Use 5th month instead of 4th month.) See instructions 19				
20 Number of days from due date of installment on line 9 to the date shown on line 19	20			
21 Number of days on line 20 after 4/15/2020 and before 7/1/2020	21			
22 Underpayment on line 17 x $\frac{\text{Number of days on line 21} \times 5\% (0.05)}{366}$...	22 \$	\$	\$	\$
23 Number of days on line 20 after 6/30/2020 and before 10/1/2020	23			
24 Underpayment on line 17 x $\frac{\text{Number of days on line 23} \times 3\% (0.03)}{366}$...	24 \$	\$	\$	\$
25 Number of days on line 20 after 9/30/2020 and before 1/1/2021	25			
26 Underpayment on line 17 x $\frac{\text{Number of days on line 25} \times 3\% (0.03)}{366}$...	26 \$	\$	\$	\$
27 Number of days on line 20 after 12/31/2020 and before 4/1/2021	27			
28 Underpayment on line 17 x $\frac{\text{Number of days on line 27} \times 3\% (0.03)}{365}$...	28 \$	\$	\$	\$
29 Number of days on line 20 after 3/31/2021 and before 7/1/2021	29			
30 Underpayment on line 17 x $\frac{\text{Number of days on line 29} \times \%}{365}$	30 \$	\$	\$	\$
31 Number of days on line 20 after 6/30/2021 and before 10/1/2021	31			
32 Underpayment on line 17 x $\frac{\text{Number of days on line 31} \times \%}{365}$	32 \$	\$	\$	\$
33 Number of days on line 20 after 9/30/2021 and before 1/1/2022	33			
34 Underpayment on line 17 x $\frac{\text{Number of days on line 33} \times \%}{365}$	34 \$	\$	\$	\$
35 Number of days on line 20 after 12/31/2021 and before 3/16/2022	35			
36 Underpayment on line 17 x $\frac{\text{Number of days on line 35} \times \%}{365}$	36 \$	\$	\$	\$
37 Add lines 22, 24, 26, 28, 30, 32, 34, and 36	37 \$	\$	\$	\$
38 Penalty. Add columns (a) through (d) of line 37. Enter the total here and on Form 1120, line 34; or the comparable line for other income tax returns	38 \$			0.

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

Schedule A Adjusted Seasonal Installment Method and Annualized Income Installment Method

See instructions.

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

Part I Adjusted Seasonal Installment Method

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

		(a)	(b)	(c)	(d)
		First 3 months	First 5 months	First 8 months	First 11 months
1 Enter taxable income for the following periods.					
a Tax year beginning in 2017	1a				
b Tax year beginning in 2018	1b				
c Tax year beginning in 2019	1c				
2 Enter taxable income for each period for the tax year beginning in 2020. See the instructions for the treatment of extraordinary items	2				
3 Enter taxable income for the following periods.		First 4 months	First 6 months	First 9 months	Entire year
a Tax year beginning in 2017	3a				
b Tax year beginning in 2018	3b				
c Tax year beginning in 2019	3c				
4 Divide the amount in each column on line 1a by the amount in column (d) on line 3a	4				
5 Divide the amount in each column on line 1b by the amount in column (d) on line 3b	5				
6 Divide the amount in each column on line 1c by the amount in column (d) on line 3c	6				
7 Add lines 4 through 6	7				
8 Divide line 7 by 3.0	8				
9a Divide line 2 by line 8	9a				
b Extraordinary items (see instructions)	9b				
c Add lines 9a and 9b	9c				
10 Figure the tax on the amt on ln 9c using the instr for Form 1120, Sch J, line 2, or comparable line of corp's return ...	10				
11a Divide the amount in columns (a) through (c) on line 3a by the amount in column (d) on line 3a	11a				
b Divide the amount in columns (a) through (c) on line 3b by the amount in column (d) on line 3b	11b				
c Divide the amount in columns (a) through (c) on line 3c by the amount in column (d) on line 3c	11c				
12 Add lines 11a through 11c	12				
13 Divide line 12 by 3.0	13				
14 Multiply the amount in columns (a) through (c) of line 10 by columns (a) through (c) of line 13. In column (d), enter the amount from line 10, column (d)	14				
15 Enter any alternative minimum tax (trusts only) for each payment period. See instructions	15				
16 Enter any other taxes for each payment period. See instr.	16				
17 Add lines 14 through 16	17				
18 For each period, enter the same type of credits as allowed on Form 2220, lines 1 and 2c. See instructions	18				
19 Total tax after credits. Subtract line 18 from line 17. If zero or less, enter -0-	19				

Part II ^{**} Annualized Income Installment Method

		(a)	(b)	(c)	(d)
		First <u>2</u> months	First <u>3</u> months	First <u>6</u> months	First <u>9</u> months
20	Annualization periods (see instructions)				
21	Enter taxable income for each annualization period. See instructions for the treatment of extraordinary items	642,306.	963,459.	1,926,918.	1,926,976.
22	Annualization amounts (see instructions)	6.000000	4.000000	2.000000	1.333330
23a	Annualized taxable income. Multiply line 21 by line 22	3,853,836.	3,853,836.	3,853,836.	2,569,295.
23b	Extraordinary items (see instructions)				
23c	Add lines 23a and 23b	3,853,836.	3,853,836.	3,853,836.	2,569,295.
24	Figure the tax on the amount on line 23c using the instructions for Form 1120, Schedule J, line 2, or comparable line of corporation's return	53,568.	53,568.	53,568.	35,713.
25	Enter any alternative minimum tax (trusts only) for each payment period (see instructions)				
26	Enter any other taxes for each payment period. See instr.				
27	Total tax. Add lines 24 through 26	53,568.	53,568.	53,568.	35,713.
28	For each period, enter the same type of credits as allowed on Form 2220, lines 1 and 2c. See instructions				
29	Total tax after credits. Subtract line 28 from line 27. If zero or less, enter -0-	53,568.	53,568.	53,568.	35,713.
30	Applicable percentage	25%	50%	75%	100%
31	Multiply line 29 by line 30	13,392.	26,784.	40,176.	35,713.

Part III Required Installments

		1st	2nd	3rd	4th
		installment	installment	installment	installment
	Note: Complete lines 32 through 38 of one column before completing the next column.				
32	If only Part I or Part II is completed, enter the amount in each column from line 19 or line 31. If both parts are completed, enter the smaller of the amounts in each column from line 19 or line 31	13,392.	26,784.	40,176.	35,713.
33	Add the amounts in all preceding columns of line 38. See instructions		13,392.	26,784.	40,176.
34	Adjusted seasonal or annualized income installments. Subtract line 33 from line 32. If zero or less, enter -0-	13,392.	13,392.	13,392.	0.
35	Enter 25% (0.25) of line 5 on page 1 of Form 2220 in each column. Note: "Large corporations," see the instructions for line 10 for the amounts to enter	14,910.	374,694.	194,802.	194,802.
36	Subtract line 38 of the preceding column from line 37 of the preceding column		1,518.	362,820.	544,230.
37	Add lines 35 and 36	14,910.	376,212.	557,622.	739,032.
38	Required installments. Enter the smaller of line 34 or line 37 here and on page 1 of Form 2220, line 10. See instructions	13,392.	13,392.	13,392.	0.

Form 2220 (2020)

**** Annualized Income Installment Method Using Standard Option**

Form 990-PF Dividends and Interest from Securities Statement 1

Source	Gross Amount	Capital Gains Dividends	(a) Revenue Per Books	(b) Net Invest- ment Income	(c) Adjusted Net Income
Dividends	219,309.	0.	219,309.	219,309.	0.
Interest	103,749.	0.	103,749.	103,749.	0.
To Part I, line 4	323,058.	0.	323,058.	323,058.	0.

Form 990-PF Taxes Statement 2

Description	(a) Expenses Per Books	(b) Net Invest- ment Income	(c) Adjusted Net Income	(d) Charitable Purposes
Federal excise tax	724,793.	0.	0.	0.
To Form 990-PF, Pg 1, ln 18	724,793.	0.	0.	0.

Form 990-PF Other Assets Statement 3

Description	Beginning of Yr Book Value	End of Year Book Value	Fair Market Value
Interest receivable	0.	103,000.	103,000.
Program and mission related investments	0.	1,715,488.	1,715,488.
To Form 990-PF, Part II, line 15	0.	1,818,488.	1,818,488.

Form 990-PF Interest and Penalties Statement 4

Tax due from Form 990-PF, Part VI	30,622.
Late payment interest	467.
Late payment penalty	919.
Total Amount Due	32,008.

Form 990-PF

Part VIII - List of Officers, Directors
Trustees and Foundation Managers

Statement 8

Name and Address	Title and Avrg Hrs/Wk	Compen- sation	Employee Ben Plan	Expense	Account
Jeffrey R. Alvord 1200 17th Street NW, Suite 501 Washington, DC 20036	Director 2.00	0.	0.	0.	0.
Jeffrey Hom 1200 17th Street NW, Suite 501 Washington, DC 20036	Secretary 1.00	0.	0.	0.	0.
Patricia Christen 1200 17th Street NW, Suite 501 Washington, DC 20036	Vice Chair 2.88	0.	0.	0.	0.
Pierre Omidyar 1200 17th Street NW, Suite 501 Washington, DC 20036	Chairman 0.00	0.	0.	0.	0.
Shaila Gupta 1200 17th Street NW, Suite 501 Washington, DC 20036	Treasurer 1.00	0.	0.	0.	0.
Stephen King 1200 17th Street NW, Suite 501 Washington, DC 20036	CEO 1.00	0.	0.	0.	0.
Hoodo Mohamed 1200 17th Street NW, Suite 501 Washington, DC 20036	Secretary 1.00	0.	0.	0.	0.
Totals included on 990-PF, Page 6, Part VIII		0.	0.	0.	0.

Grantee's Name

The Nuffield Foundation

Grantee's Address

28 Bedford Square
London, UNITED KINGDOM, WC1B 3JS

<u>Grant Amount</u>	<u>Date of Grant</u>	<u>Amount Expended</u>
255,000.	10/08/20	41,667.

Purpose of Grant

Support for Nuffield Foundation's Ada Lovelace Institute project, a charitable and educational project focused on research related to promoting public understanding of the impact of artificial intelligence and data driven technology on different groups in society

Dates of Reports by Grantee

07/01/2021

Any Diversion by Grantee

No

Grantee's Name

Open Data Institute

Grantee's Address

65 Clifton Street, 3rd Floor
London, UNITED KINGDOM, EC2A 4JE

<u>Grant Amount</u>	<u>Date of Grant</u>	<u>Amount Expended</u>
2,800,000.	01/01/18	2,256,365.

Purpose of Grant

To support the Open Data Institute, an organisation working with companies and governments to build an open, trustworthy data ecosystem, where people can make better decisions using data and manage any harmful impacts.

Dates of Reports by Grantee

06/30/2021

Any Diversion by Grantee

No

Grantee's Name

openDemocracy Limited

Grantee's Address

The Print House, 18 Ashwin Street
London, UNITED KINGDOM, E8 3DL

<u>Grant Amount</u>	<u>Date of Grant</u>	<u>Amount Expended</u>
650,000.	06/20/19	471,768.

Purpose of Grant

To support independent journalism that educates citizens and encourages democratic and nonpartisan debate

Dates of Reports by Grantee

06/28/2021

Any Diversion by Grantee

No

Grantee's Name

Open Data Institute

Grantee's Address

65 Clifton Street, 3rd Floor
London, UNITED KINGDOM, EC2A 4JE

<u>Grant Amount</u>	<u>Date of Grant</u>	<u>Amount Expended</u>
1,105,000.	12/01/20	0.

Purpose of Grant

To support several exclusively charitable program areas of Open Data Institute including the Data Institutions Program, Data Skills/Literacy Program, Data Governance/ Assurance Program, and strategic development of charitable and educational programs

Dates of Reports by Grantee

06/30/2021

Any Diversion by Grantee

No

Grantee's Name

Magamba Cultural Activist Network Trust

Grantee's Address

3 Allan Wilson Greater Avenues
Harare, ZIMBABWE

<u>Grant Amount</u>	<u>Date of Grant</u>	<u>Amount Expended</u>
315,000.	05/01/19	297,644.

Purpose of Grant

To support Magamba to increase youth participation in national governance processes and consolidate citizen engagement through digital media and the use of civic tech in Zimbabwe.

Dates of Reports by Grantee

7/20/2021

Any Diversion by Grantee

No

Activity One

Civic Empowerment impact area aims to reduce barriers to marginalised groups' full participation in society, improve equitable access to effective public services, and protect inclusive participation and dissent. In this impact area our priorities are to improve equitable access to effective public services; defend the ability of marginalised groups to be full and active members of society; protect inclusive participation and dissent; and challenge and shift unjust power structures.

Expenses

To Form 990-PF, Part IX-A, line 1

15,640,203.

Activity Two

Data & Digital Rights impact area focuses on ensuring the rights of people and communities are upheld in the design and use of data and technology. In this impact area our priorities are to give everyone more power over the data that impacts their lives and societies; influence data norms and standards worldwide; and make data and digital infrastructure fairer and more accessible.

Expenses

To Form 990-PF, Part IX-A, line 2

12,655,579.

Form 990-PF

Summary of Direct Charitable Activities

Statement 12

Activity Three

Financial Transparency impact area works to tackle corruption and demand transparency, accountability, and participation in the use of public funds. In this impact area our priorities are to set higher transparency standards; target corruption with a focus on responsiveness and enforcement; strengthen accountability at the local level; and build the financial transparency ecosystem.

Expenses

To Form 990-PF, Part IX-A, line 3

8,333,833.

Form 990-PF

Summary of Direct Charitable Activities

Statement 13

Activity Four

Independent Media impact area concentrates on defending a vibrant, free press that uncovers the truth and holds power to account. In this impact area our priorities are to support investigative journalism committed to uncovering the truth; help build innovative business models for editorial independence; support press freedom; and stimulate independent media innovation and attract capital to the sector.

Expenses

To Form 990-PF, Part IX-A, line 4

7,979,508.

Form 990-PF

Summary of Program-Related Investments

Statement 14

Description

Media Development Investment Fund is a non-profit mission-driven investment fund that supports primarily for-profit independent news outlets in countries with a history of media oppression.

Amount

To Form 990-PF, Part IX-B, line 1

1,000,000.

General Explanation

Statement 15

Form/Line Identifier and Description/Return Reference

990-PF, Part VII-B, Line 1a(3) - Contributed Services explanation

Explanation:

During 2020, Luminate US Services LLC, provided general and administrative support staff and paid for professional legal costs on behalf of the Foundation. In addition, other affiliated entities and related parties provided in-kind services related to investment management and travel. The amount of contributed services is valued at \$10,581,350 but not recorded on Form 990-PF.

Form **5471**

Information Return of U.S. Persons With Respect to Certain Foreign Corporations

OMB No. 1545-0123

(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Information furnished for the foreign corporation's annual accounting period (tax year required by section 898) (see instructions) beginning **JAN 1, 2020**, and ending **DEC 31, 2020**

Attachment
Sequence No. **121**

Name of person filing this return Luminate Foundation, Inc. <small>Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)</small> 1200 17th Street NW, No. 501 City or town, state, and ZIP code Washington, DC 20036	A Identifying number 82-3941326 B Category of filer (See instructions. Check applicable box(es).): 1a <input type="checkbox"/> 1b <input type="checkbox"/> 1c <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input checked="" type="checkbox"/> 4 <input type="checkbox"/> 5a <input type="checkbox"/> 5b <input type="checkbox"/> 5c <input type="checkbox"/> C Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period 43.50 %
Filer's tax year beginning JAN 1, 2020 , and ending DEC 31, 2020	

D Check box if this is a final Form 5471 for the foreign corporation

E Check if any excepted specified foreign financial assets are reported on this form (see instructions)

F Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40

G If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions) ▶

H Person(s) on whose behalf this information return is filed:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation CcHUB Growth Capital Limited 1st Floor, 294, Herbert Macaulay Way Sabo-Yaba Lagos Nigeria				b(1) Employer identification number, if any b(2) Reference ID number (see instructions) CCHUB15471 c Country under whose laws incorporated Nigeria	
d Date of incorporation	e Principal place of business	f Principal business activity code number	g Principal business activity	h Functional currency code	
01/06/16	Lagos Nigeria	523900	Investments	NGN	

2 Provide the following information for the foreign corporation's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States N/A		b If a U.S. income tax return was filed, enter: <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">(i) Taxable income or (loss)</td> <td style="width:50%;">(ii) U.S. income tax paid (after all credits)</td> </tr> <tr> <td> </td> <td> </td> </tr> </table>		(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)		
(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)						
c Name and address of foreign corporation's statutory or resident agent in country of incorporation N/A		d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different N/A					

Schedule A Stock of the Foreign Corporation		
(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
Common	150,000	150,000
Preferred	1,000,000	1,000,000

LHA For Paperwork Reduction Act Notice, see instructions. Form **5471** (Rev. 12-2020)

See Statement 16

Schedule C **Income Statement**

Important: Report all information in functional currency in accordance with U.S. GAAP. Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for DASTM corporations.

		Functional Currency	U.S. Dollars
Income	1a Gross receipts or sales	1a	
	b Returns and allowances	1b	
	c Subtract line 1b from line 1a	1c	
	2 Cost of goods sold	2	2,656,250.
	3 Gross profit (subtract line 2 from line 1c)	3	-2,656,250.
	4 Dividends	4	
	5 Interest	5	
	6a Gross rents	6a	
	b Gross royalties and license fees	6b	
	7 Net gain or (loss) on sale of capital assets	7	
8a Foreign currency transaction gain or loss - unrealized	8a		
	b Foreign currency transaction gain or loss - realized	8b	
9 Other income (attach statement)	9	10,651.	
10 Total income (add lines 3 through 9)	10	-2,645,599.	
Deductions	11 Compensation not deducted elsewhere	11	8,021,662.
	12a Rents	12a	1,200,000.
	b Royalties and license fees	12b	
	13 Interest	13	
	14 Depreciation not deducted elsewhere	14	278,109.
	15 Depletion	15	
	16 Taxes (exclude income tax expense (benefit))	16	
	17 Other deductions (attach statement - exclude income tax expense (benefit))	17	8,953,838.
18 Total deductions (add lines 11 through 17)	18	18,453,609.	
Net Income	19 Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10)	19	-21,099,208.
	20 Unusual or infrequently occurring items	20	
	21a Income tax expense (benefit) - current	21a	
	b Income tax expense (benefit) - deferred	21b	
22 Current year net income or (loss) per books (combine lines 19 through 21b)	22	-21,099,208.	
Other Comprehensive Income	23a Foreign currency translation adjustments	23a	-8,059,512.
	b Other	23b	814,075,646.
	c Income tax expense (benefit) related to other comprehensive income	23c	
	24 Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c)	24	806,016,134.

Schedule F Balance Sheet

Important: Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1 Cash	1	137,111.	22,464.
2a Trade notes and accounts receivable	2a		
b Less allowance for bad debts	2b	()	()
3 Derivatives	3		
4 Inventories	4		
5 Other current assets (attach statement) See Statement 19	5	6,637.	6,224.
6 Loans to shareholders and other related persons	6		
7 Investment in subsidiaries (attach statement) See Statement 20	7	1,777,978.	3,851,013.
8 Other investments (attach statement)	8		
9a Buildings and other depreciable assets	9a	1,224.	425.
b Less accumulated depreciation	9b	()	()
10a Depletable assets	10a		
b Less accumulated depletion	10b	()	()
11 Land (net of any amortization)	11		
12 Intangible assets:			
a Goodwill	12a		
b Organization costs	12b		
c Patents, trademarks, and other intangible assets	12c		
d Less accumulated amortization for lines 12a, 12b, and 12c	12d	()	()
13 Other assets (attach statement)	13		
14 Total assets	14	1,922,950.	3,880,126.
Liabilities and Shareholders' Equity			
15 Accounts payable	15		
16 Other current liabilities (attach statement) See Statement 21	16	486,506.	471,501.
17 Derivatives	17		
18 Loans from shareholders and other related persons	18		
19 Other liabilities (attach statement)	19		
20 Capital stock:			
a Preferred stock	20a	46,330.	66,420.
b Common stock	20b		
21 Paid-in or capital surplus (attach reconciliation)	21		
22 Retained earnings	22	1,390,114.	3,342,205.
23 Less cost of treasury stock	23	()	()
24 Total liabilities and shareholders' equity	24	1,922,950.	3,880,126.

Schedule G Other Information

	Yes	No
1 During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership?		X
If "Yes," see the instructions for required statement.		
2 During the tax year, did the foreign corporation own an interest in any trust?		X
3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)?		X
If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		
4a During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)?		X
If "Yes," complete lines 4b and 4c.		
b Enter the total amount of the base erosion payments ▶ \$ _____		
c Enter the total amount of the base erosion tax benefit ▶ \$ _____		
5a During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A?		X
If "Yes," complete line 5b.		
b Enter the total amount of the disallowed deductions (see instructions) ▶ \$ _____		

Form 5471 Name, Address, Identifying Number and Number of Statement 16
Shares Subscribed to by Each Subscriber to
the Stock of the Foreign Corporation

Name and Address	Identifying Number	Number of Shares
Luminate Foundation, Inc 1200 17th Street NW #501 Washington DC 20036	82-3941326	500,000
Co-Creation Hub Limited 1st Floor, 294 Lagos unknown Nigeria	99-9999999	300,000
Bank of Industry 1st Floor, 294 Lagos unknown Nigeria	99-9999999	230,000
Venture Garden Group 1st Floor, 294 Lagos unknown Nigeria	99-9999999	120,000
Omidyar Network Fund Inc 1991 Broadway St #200 Redwood City CA 94063	20-1173866	0

Form 5471 Other Income Statement 17

Description	Functional Currency	Exchange Rate	U.S. Dollar
Investment income	10,651.	375.653600	28.
Total to 5471, Schedule C, line 9	10,651.		28.

Form 5471 Other Deductions Statement 18

Description	Functional Currency	Exchange Rate	U.S. Dollar
Auditor's Remuneration	3,150,000.	375.653600	8,385.
Legal and professional fees	1,612,500.	375.653600	4,293.
Bank charges	131,252.	375.653600	349.
Electricity and diesel expenses	378,000.	375.653600	1,006.
Office consumables	306,000.	375.653600	815.
Tax consultancy	1,773,750.	375.653600	4,722.
Telephone & Internet expenses	1,020,000.	375.653600	2,715.
Travel expenses	386,243.	375.653600	1,028.
Meals and entertainmen	52,000.	375.653600	138.
Office expenses	58,700.	375.653600	156.
Subscription & Licensing Expenses	85,393.	375.653600	227.
Total to 5471, Schedule C, line 17	8,953,838.		23,834.

Form 5471	Other Current Assets	Statement 19
Description	Beg. of Annual Accounting Period	End of Annual Accounting Period
Withholding receivable	6,637.	6,224.
Total to 5471, Page 4, Schedule F, line 5	6,637.	6,224.

Form 5471	Investment in Subsidiaries	Statement 20
Description	Beg. of Annual Accounting Period	End of Annual Accounting Period
Delivery Science Limited	126,039.	118,182.
DrugStoc E-HUB Limited	161,357.	691,169.
Edves Limited	91,274.	120,000.
Finance Life Technologies Limited	687,950.	519,610.
Lifebank Logistics & Technology Lt	391,413.	1,368,701.
Taeillo Limited	319,945.	1,033,351.
Total to 5471, Page 3, Schedule F, line 7	1,777,978.	3,851,013.

Form 5471	Other Current Liabilities	Statement 21
Description	Beg. of Annual Accounting Period	End of Annual Accounting Period
Accrued expenses	15,169.	28,442.
Payables	423.	1,501.
Redeemable preference shares	470,914.	441,558.
Total to 5471, Page 4, Schedule F, line 16	486,506.	471,501.

Schedule G Other Information (continued)

		Yes	No
6a	Is the filer of this Form 5471 claiming a foreign-derived intangible income deduction (under section 250) with respect to any amounts listed on Schedule M? If "Yes," complete lines 6b, 6c, and 6d.		X
b	Enter the amount of gross income derived from sales, leases, exchanges, or other dispositions (but not licenses) from transactions with the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) (see instructions) ▶ \$ _____		
c	Enter the amount of gross income derived from a license of property to the foreign corporation that the filer included in its computation of FDDEI (see instructions) ▶ \$ _____		
d	Enter the amount of gross income derived from services provided to the foreign corporation that the filer included in its computation of FDDEI (see instructions) ▶ \$ _____		
7	During the tax year, was the foreign corporation a participant in any cost-sharing arrangement?		X
8	During the course of the tax year, did the foreign corporation become a participant in any cost-sharing arrangement?		X
9	If the answer to question 7 is "Yes," was the foreign corporation a participant in a cost-sharing arrangement that was in effect before January 5, 2009?		
10	If the answer to question 7 is "Yes," did a U.S. taxpayer make any platform contributions as defined under Regulations section 1.482-7(c) to that cost-sharing arrangement during the taxable year?		
11	If the answer to question 10 is "Yes," enter the present value of the platform contributions in U.S. dollars ▶ \$ _____		
12	If the answer to question 10 is "Yes," check the box for the method under Regulations section 1.482-7(g) used to determine the price of the platform contribution transaction(s): <input type="checkbox"/> Comparable uncontrolled transaction method <input type="checkbox"/> Income method <input type="checkbox"/> Acquisition price method <input type="checkbox"/> Market capitalization method <input type="checkbox"/> Residual profit split method <input type="checkbox"/> Unspecified methods		
13	From April 25, 2014, to December 31, 2017, did the foreign corporation purchase stock or securities of a shareholder of the foreign corporation for use in a triangular reorganization (within the meaning of Regulations section 1.358-6(b)(2))?		X
14a	Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the taxable year?		X
	If "Yes," go to line 14b.		
b	Enter the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the taxable year ▶ \$ _____		
15	During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section 1.7874-12(a)(9)?		X
	If "Yes," see instructions and attach statement.		
16	During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations section 1.6011-4?		X
	If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		
17	During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		X
18	During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?		X
19	Did you answer "Yes" to any of the questions in the instructions for line 19?		X
	If "Yes," enter the corresponding code(s) from the instructions and attach statement ▶ _____		
20	Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)?		X
	If "Yes," enter the amount ▶ \$ _____		
21	Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to the current tax year (see instructions)?		X
	If "Yes," enter the amount ▶ \$ _____		
22a	Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year (see instructions)?		X
b	If the answer to question 22a is "Yes," was an election made to close the tax year such that no amount is treated as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)?		

Schedule I Summary of Shareholder's Income From Foreign Corporation

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name of U.S. shareholder	Identifying number		
1 a Section 964(e)(4) Subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)		1 a	
b Section 245A(e)(2) Subpart F income from hybrid dividends of tiered corporations (see instructions)		1 b	
c Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)		1 c	
d Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)		1 d	
e Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A)		1 e	
f Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)		1 f	
g Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A)		1 g	
h Other subpart F income (enter result from Worksheet A)		1 h	
2 Earnings invested in U.S. property (enter the result from Worksheet B)		2	
3 Reserved for future use		3	
4 Factoring income See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.		4	
5 a Section 245A eligible dividends (see instructions)		5 a	
b Extraordinary disposition amounts (see instructions)		5 b	
c Extraordinary reduction amounts (see instructions)		5 c	
d Section 245A(e) dividends (see instructions)		5 d	
e Dividends not reported on line 5a, 5b, 5c, or 5d		5 e	
6 Exchange gain or (loss) on a distribution of previously taxed earnings and profits		6	

	Yes	No
7 a Was any income of the foreign corporation blocked?		
b Did any such income become unblocked during the tax year (see section 964(b))?		
If the answer to either question is "Yes," attach an explanation.		
8 a Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign corporation at any time during the tax year (see instructions)?		
b If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
c Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
9 Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions) \$ _____		

**SCHEDULE O
(Form 5471)**

(Rev. December 2012)

Department of the Treasury
Internal Revenue Service

Organization or Reorganization of Foreign Corporation, and Acquisitions and Dispositions of its Stock

Information about Schedule O (Form 5471) and its instructions is at www.irs.gov/form5471

▶ Attach to Form 5471.

OMB No. 1545-0704

Name of person filing Form 5471 Luminate Foundation, Inc.		Identifying number 82-3941326
Name of foreign corporation CcHUB Growth Capital Limited	EIN (if any)	Reference ID number CCHUB15471

Important: Complete a separate Schedule O for each foreign corporation for which information must be reported.

Part I To Be Completed by U.S. Officers and Directors				
(a) Name of shareholder for whom acquisition information is reported	(b) Address of shareholder	(c) Identifying number of shareholder	(d) Date of original 10% acquisition	(e) Date of additional 10% acquisition

Part II To Be Completed by U.S. Shareholders	
Note: If this return is required because one or more shareholders became U.S. persons, attach a list showing the names of such persons and the date each became a U.S. person.	

Section A - General Shareholder Information				
(a) Name, address, and identifying number of shareholder(s) filing this schedule	(b) For shareholder's latest U.S. income tax return filed, indicate:			(c) Date (if any) shareholder last filed information return under section 6046 for the foreign corporation
	(1) Type of return (enter form number)	(2) Date return filed	(3) Internal Revenue Service Center where filed	
Stmt 22 Luminate Foundation, Inc. 1200 17th St NW, 501 Washington 82-3941326	990-PF	11/15/21	e-filed	

Section B - U.S. Persons Who Are Officers or Directors of the Foreign Corporation				
(a) Name of U.S. officer or director	(b) Address	(c) Social security number	(d) Check appropriate box(es)	
			Officer	Director

Section C - Acquisition of Stock						
(a) Name of shareholder(s) filing this schedule	(b) Class of stock acquired	(c) Date of acquisition	(d) Method of acquisition	(e) Number of shares acquired		
				(1) Directly	(2) Indirectly	(3) Constructively
Luminate Foundation	Preferred	01/01/2020	Purchase	500,000		

(f) Amount paid or value given	(g) Name and address of person from whom shares were acquired
715,488.	Omidyar Network Fund Inc 1991 Broadway St, Ste 200 Redwood City CA 94063

Section D - Disposition of Stock

(a) Name of shareholder disposing of stock	(b) Class of stock	(c) Date of disposition	(d) Method of disposition	(e) Number of shares disposed of		
				(1) Directly	(2) Indirectly	(3) Constructively

(f) Amount received	(g) Name and address of person to whom disposition of stock was made

Section E - Organization or Reorganization of Foreign Corporation

(a) Name and address of transferor	(b) Identifying number (if any)	(c) Date of transfer

(d) Assets transferred to foreign corporation			(e) Description of assets transferred by, or notes or securities issued by, foreign corporation
(1) Description of assets	(2) Fair market value	(3) Adjusted basis (if transferor was U.S. person)	

Section F - Additional Information

(a) If the foreign corporation or a predecessor U.S. corporation filed (or joined with a consolidated group in filing) a U.S. income tax return for any of the last 3 years, attach a statement indicating the year for which a return was filed (and, if applicable, the name of the corporation filing the consolidated return), the taxable income or loss, and the U.S. income tax paid (after all credits).

(b) List the date of any reorganization of the foreign corporation that occurred during the last 4 years while any U.S. person held 10% or more in value or vote (directly or indirectly) of the corporation's stock ►

(c) If the foreign corporation is a member of a group constituting a chain of ownership, attach a chart, for each unit of which a shareholder owns 10% or more in value or voting power of the outstanding stock. The chart must indicate the corporation's position in the chain of ownership and the percentages of stock ownership (see instructions for an example).

(a) Name, Address, and Identifying Number of Shareholder(s) Filing this Schedule	(b) For Shareholder's Latest U.S. Income Tax Return Filed Indicate:			(c) Date Sharehold -er Last Filed In- formation Rtn under Sec. 6046
	(1) Type of Return (Enter Form Number)	(2) Date Return Filed	(3) Internal Revenue Service Center where Filed	
Luminate Foundation, Inc. 1200 17th St NW, 501 Washingto 82-3941326	990-PF	11/15/21	e-filed	

**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.

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

Name of transferor Luminate Foundation, Inc.	Identifying number (see instructions) 82-3941326
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- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes No
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? Yes No
- b** Did the transferor remain in existence after the transfer? Yes No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

- d** Have basis adjustments under section 367(a)(4) been made? Yes No

- 3** If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
- a** List the name and EIN of the transferor's partnership.

Name of partnership	EIN of partnership

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

Part II Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation) CcHUB Growth Capital Limited	5a Identifying number, if any
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6 Address (including country) 1st Floor, 294, Herbert Macaulay Way Sabo-Yaba, Lagos Nigeria	5b Reference ID number CCHUB926
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7 Country code of country of incorporation or organization
NI

8 Foreign law characterization (see instructions)
LLC

- 9** Is the transferee foreign corporation a controlled foreign corporation? Yes No

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

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	01/01/2020		715,488.		

10 Was cash the only property transferred? **Yes** **No**
 If "Yes," skip the remainder of Part III and go to Part IV.

Section B - Other Property (other than intangible property subject to section 367(d))

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
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? **Yes** **No**

12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? **Yes** **No**
 If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? **Yes** **No**
 If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? **Yes** **No**
 If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

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

13 Did the transferor transfer property described in section 367(d)(4)? **Yes** **No**
 If "No," skip Section C and questions 14a through 15.

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

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
Property described in sec. 367(d)(4)						
Totals						

- 14 a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? Yes No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Yes No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? Yes No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$ _____
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)? Yes No

Supplemental Part III Information Required To Be Reported (see instructions)

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

- 16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
(a) Before .000 % (b) After 43.500 %
- 17 Type of nonrecognition transaction (see instructions) ▶ Section 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
 - a Gain recognition under section 904(f)(3) Yes No
 - b Gain recognition under section 904(f)(5)(F) Yes No
 - c Recapture under section 1503(d) Yes No
 - d Exchange gain under section 987 Yes No
- 19 Did this transfer result from a change in entity classification? Yes No
- 20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) Yes No
If "Yes," complete lines 20b and 20c.
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ _____
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions Yes No