

Avenue Aviation Opportunities Fund II (Offshore), LP

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New Category	LP
Investment Manager	Avenue Capital
Fund Status	
Archive	No
Custodian	N/A
Jurisdiction	Cayman Islands
T1135 Reporting	Yes
Currency	USD
Tax Slip	PFIC
Receiver of Tax Receipt	RFO/Client
Tax Slips Expected	August/September
Statements Expected	Quarterly
Accounting Treatment	<p>Per PFIC. When distributions are received you will decrease the ACB of the investment until the tax information is received at year-end and then reclassify accordingly</p>
Tax Memo/ Tax Treatment	<p>Per PFIC In 2021, Assets of the original Opportunities Aviation fund were transferred to other entities in the group. For US tax purposes, the rollover occurred on a tax-free basis, however tax-free rollover does not apply for Canadian purposes. As such, the Canadian investors will likely need to realize a capital gain or capital loss on that transfer.</p>

US Tax Return Required

No

Type

Partnership

**Nature
of Investment**

Private credit fund operating in the aviation sector.

Notes