

# Starwood REIT Offshore Fund , SPC

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| <b>New Category</b>            | Investment in Private Company  |
| <b>Investment Manager</b>      | Starwood Capital Group   |
| <b>Fund Status</b>             | Open   |
| <b>Archive</b>                 | No   |
| <b>Custodian</b>               | SS&C Technologies Inc  |
| <b>Jurisdiction</b>            | Cayman Islands   |
| <b>T1135 Reporting</b>         | Yes (unless holds more than 10% - T1134)   |
| <b>Currency</b>                | USD  |
| <b>Tax Slip</b>                | Form 1099, Tax Summary Statement   |
| <b>Receiver of Tax Receipt</b> | RFO / Client   |
| <b>Tax Slips Expected</b>      | February   |
| <b>Statements Expected</b>     | Monthly  |
| <b>Accounting Treatment</b>    | Distributions should be treated as dividends and are considered as foreign dividend income. If there's redemption of shares, capital gains/losses need to be calculated. Please reconcile at year-end.                 |
| <b>Tax Memo/ Tax Treatment</b> | Canadians own shares of a Cayman Corporation. To the extent distributions are made by the Cayman entity, they are considered as foreign dividend income. In case of a redemption of shares, a capital gain will arise. |
| <b>US Tax Return Required</b>  | No   |
| <b>Type</b>                    | Corporation  |
| <b>Nature of Investment</b>    | Fund invests in Starwood REIT, which is a publicly registered, but not publicly traded, primarily U.S. REIT with a focus on multi-family & industrial properties.  |

