Accountants' terminology, 113	Berkshire Hathaway, 4-5
Accounting. See also Method of	Beta, 185, 187, 189
layering; Methods of aggregation;	Bifurcation of capital accounts, 56, 61,
Tax allocations of partner income	63, 119–120
automation of, 95-96	bifurcation fraction, 56, 61, 63
financial statements, 85-93	Black-Scholes formula valuation, 74-77,
interim valuation, 93-96, 197	74n2, 76n3
IRS tax return filing, 80-85	Blackstone Group, 31, 76
method of layering, 115-118	Blocker entities, 17, 41, 162, 164, 198
partnership accounting for U.S.	Book capusi account value, 113
funds, 79–80	Book gains, 138
Accounting methods, 89-93	Books of account, 95
Accredited investors, 10–11, 11n7,	Book-tax disparities, 139–143, 230–231,
211–218	248, 262–266
Accrual accounting method, 89–93	Born, Brooksley, 163n1
Additivity constraints, 234–235	Boyd, Stephen, 146n4, 149n9, 276
Aggregate economic profit, 82, 106	British Dominions, 35-39
AIG (American International Group),	British Virgin Islands, 35
12	Buffett, Warren, 4, 22
AIMR-PPS standards, 176–177	
Alternative Investment Management	Call options, 74-77, 74n2, 76n3
Institute (AIMA), 27, 27n27	Calmar ratio, 186, 186n4
American depository receipts (ADR),	Capital account audit, 99
172	Capital account value, vs. tax basis,
Annualized volatility, 184-185	112
Audits:	Capital gains, 268-269. See also Method
of capital accounts, 99	of layering; Methods of
independent, 203	aggregation
of offshore funds, 97-98	allocating with dividends and
of U.S. funds, 98–99	interest, 268–272
Automation of accounting, 95-96	and exchange-traded futures
	contracts, 164–165
Balance sheet, 86	long term, tax rates, 164
Bankruptcy, 84-85, 86, 163	long vs. short-term, 117–118,
Barclay Hedge, 25	139–140
Bellamy, Chris, 113n4, 132n1	netting, 205
Benchmarks, 185	in partial netting, 138–141

Duality, 149n9, 151n11 and tax basis, 110-113 tax preference of, 166, 167-168 Dutch dominions, 35 terminal, 128 Capital losses, tax preference of, 166 Economic accounting, 203, 204 Carlyle Capital Corporation (CCC), Economies of scale, 33 72-74, 83 Entity classification, 19n15, 79 Cartwright, Brian G., 1n1, 193 ERISA (Employee Retirement Income Cayman Islands, 35–39 Security Act of 1974), 173–174, Cayman Islands exempt company, 173n3 37 Estate tax, 22 Excel Solver, 148-149, 151, 151n12 Cayman Islands limited partnership, 39, 161–162 Exchange-traded futures contracts, Cayman Islands registered mutual 164-165, 170 Excise taxes, 171-172 fund, 38 CFA Institute, 175, 179 Feasibility constraints in full netting, Claw-back provision, 66–71 Coleman, T.F., 149n9 233-235 Connecticut, and hedge fund Fees: fixed, 30-31, 49-55, 86, 107-108 governance, 6, 8, 79 Constraints in full netting, 233-235 management, 166, 169 Contributed property, 225-227, 260 and net asset value (NAV), 71-74 Controlled Foreign Corporations (CFC) of offshore funds, 37 classification, 18, 18n11 performance (see Performance fees) Convex objective function, 232-233. periodic, 53 sharing of, 29 Convex optimization, 145, 145n2 Financial meltdown of 2008, 27-28 145n3, 148-152, 235-236 Financial statements, 85-93 Convex Optimization (Boyd and hedge funds, 88-93 Vandenberghe), 146n4 venture funds, 88 Convex programming packages, Fixed fees, 30-31 237–248. See also Matlab; calculation of, 49-55, 107-108 Open-Source CVX; Open-Source R and financial statements, 85-86 Credit default swaps, 28 in historical risk-return review, CVX. See Open-Source CVX 184-185 and IRS filings for U.S. hedge funds, Delaware, and hedge fund governance, 6-8, 10, 79-80 paid by limited partners, 121-122 Distributive income, taxation of, 164 Flow of funds statement, 86–87 Dividends, 164, 268-272 Foreign investors, 11-14, 44-46, 80 allocating with interest and capital Foreign tax credit, 171 gains, 268–272 Foreign tax paid, 166, 168, 268–269 ordinary, 169 Foreign tax recovery structure, qualified, 122 173 - 174tracking of, 168 Fortress Investment Group, 31, 76 Double taxation, 4 Fraud: Drawdown, 186. See also Maximum Bernard Madoff scandal, 23-25 drawdown Swiss bank accounts, 19-22

Full netting, 141–146, 150n10, 158–160,	industry size, 25-28
196, 226, 260	investments of, 199
compared with layering, 159	investors in, 199-200
constrained optimization problem of,	IRS filings for, 80–85
235	organizing, 6–10
constraints from Treasury	similarity to mutual funds, 176–177
regulations, 233–235	tax components of income from,
mathematical translation of Treasury	103–105
regulations, 229–231	types of entities, 4-6
methodology and implementation	Hedge fund structure, 6–7
example, 229–252	offshore funds, 35–39
objective, 229	offshore master/U.S. feeder, 40-43,
optimization problem of, 250	45–46, 95–96
tax-book disparities, 230-231	Hennart, J.P., 149n9
Fund-of-Funds (FoF), 28-30	Hessian matrix, 236–237, 241, 243, 250,
Fund valuation, 48-49, 71-74	252, 271
Futures contracts, exchange-traded,	High-water mark, 31, 56–57, 60–66, 70,
164–165	189
	Historical risk and return review,
Gates, Bill, 22	183-199
Genentech, 3	Hurdle amount, 57–58, 60–61
General partnerships, 6–10	Hurdle rate, 31–32, 58, 67, 76, 119,
Gill, P.E., 149n9	182,
C1-1-1 C: 25	NT
Global Crossings, 35	Hypothetical limited partner account,
Global Investment Performance	184
Global Investment Performance Standards (GIPS), 68, 70	184
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/	184 Idnani, A., 149n9
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92	184 Idnani, A., 149n9 Illiquid tax lots, 156
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification, 175–179	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review,	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account,
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 249–252	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 243–252 Goldfarb, D., 149n9	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum, 243–252 Goldfarb, D., 149n9 Google, 3	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions,
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 243–252 Goldfarb, D., 149n9 Google, 3 Greenspan, Alan, 163n1	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions, 137–138
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum, 243–252 Goldfarb, D., 149n9 Google, 3	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions, 137–138 Inside tax basis, 138
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 243–252 Goldfarb, D., 149n9 Google, 3 Greenspan, Alan, 163n1 Guaranteed payments, 122, 169	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions, 137–138 Inside tax basis, 138 Institutional investors, 12, 17, 67–71
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 243–252 Goldfarb, D., 149n9 Google, 3 Greenspan, Alan, 163n1 Guaranteed payments, 122, 169 Hedge fund income, tax components	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions, 137–138 Inside tax basis, 138 Institutional investors, 12, 17, 67–71 Interest, 118–120
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 243–252 Goldfarb, D., 149n9 Google, 3 Greenspan, Alan, 163n1 Guaranteed payments, 122, 169  Hedge fund income, tax components of, 103–105	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions, 137–138 Inside tax basis, 138 Institutional investors, 12, 17, 67–71 Interest, 118–120 Interest, tax allocation of, 268–272
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 249–252 Goldfarb, D., 149n9 Google, 3 Greenspan, Alan, 163n1 Guaranteed payments, 122, 169  Hedge fund income, tax components of, 103–105 Hedge fund managers, 30–32	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions, 137–138 Inside tax basis, 138 Institutional investors, 12, 17, 67–71 Interest, 118–120 Interest, tax allocation of, 268–272 Interest expense taxation, 165–166
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 249–252 Goldfarb, D., 149n9 Google, 3 Greenspan, Alan, 163n1 Guaranteed payments, 122, 169  Hedge fund income, tax components of, 103–105 Hedge fund managers, 30–32 Hedge Fund Research (HFR), 25	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions, 137–138 Inside tax basis, 138 Institutional investors, 12, 17, 67–71 Interest, 118–120 Interest, tax allocation of, 268–272 Interest expense taxation, 165–166 Interim valuation, 93–96, 197
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 249–252 Goldfarb, D., 149n9 Google, 3 Greenspan, Alan, 163n1 Guaranteed payments, 122, 169 Hedge fund income, tax components of, 103–105 Hedge fund managers, 30–32 Hedge Fund Research (HFR), 25 Hedge funds, 95–96	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions, 137–138 Inside tax basis, 138 Institutional investors, 12, 17, 67–71 Interest, 118–120 Interest, tax allocation of, 268–272 Interest expense taxation, 165–166 Interim valuation, 93–96, 197 Investment Company Institute, 26
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 249–252 Goldfarb, D., 149n9 Google, 3 Greenspan, Alan, 163n1 Guaranteed payments, 122, 169  Hedge fund income, tax components of, 103–105 Hedge fund managers, 30–32 Hedge Fund Research (HFR), 25 Hedge funds, 95–96 2005 SEC rules for, 2–3	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions, 137–138 Inside tax basis, 138 Institutional investors, 12, 17, 67–71 Interest, 118–120 Interest, tax allocation of, 268–272 Interest expense taxation, 165–166 Interim valuation, 93–96, 197 Investment Company Institute, 26 Investment expense, 268–269
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 249–252 Goldfarb, D., 149n9 Google, 3 Greenspan, Alan, 163n1 Guaranteed payments, 122, 169  Hedge fund income, tax components of, 103–105 Hedge fund managers, 30–32 Hedge Fund Research (HFR), 25 Hedge funds, 95–96 2005 SEC rules for, 2–3 defined, 1	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions, 137–138 Inside tax basis, 138 Institutional investors, 12, 17, 67–71 Interest, 118–120 Interest, tax allocation of, 268–272 Interest expense taxation, 165–166 Interim valuation, 93–96, 197 Investment Company Institute, 26 Investment expense, 268–269 Investment interest expense, 168
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 249–252 Goldfarb, D., 149n9 Google, 3 Greenspan, Alan, 163n1 Guaranteed payments, 122, 169  Hedge fund income, tax components of, 103–105 Hedge fund managers, 30–32 Hedge Fund Research (HFR), 25 Hedge funds, 95–96 2005 SEC rules for, 2–3 defined, 1 distinction from mutual funds, 26–27	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions, 137–138 Inside tax basis, 138 Institutional investors, 12, 17, 67–71 Interest, 118–120 Interest, tax allocation of, 268–272 Interest expense taxation, 165–166 Interim valuation, 93–96, 197 Investment Company Institute, 26 Investment expense, 268–269 Investment interest expense, 168 Investment management company
Global Investment Performance Standards (GIPS), 68, 70 accounting requirements/ recommendations, 91–92 CFA Institute verification 175–179 for historical risk and return review, 183–190 Global optimum 249–252 Goldfarb, D., 149n9 Google, 3 Greenspan, Alan, 163n1 Guaranteed payments, 122, 169  Hedge fund income, tax components of, 103–105 Hedge fund managers, 30–32 Hedge Fund Research (HFR), 25 Hedge funds, 95–96 2005 SEC rules for, 2–3 defined, 1	Idnani, A., 149n9 Illiquid tax lots, 156 Incentives, 30–31 Income statement, 86 Indicative limited partner account, 184 Information ratio, 186 In-kind property contributions, 137–138 Inside tax basis, 138 Institutional investors, 12, 17, 67–71 Interest, 118–120 Interest, tax allocation of, 268–272 Interest expense taxation, 165–166 Interim valuation, 93–96, 197 Investment Company Institute, 26 Investment expense, 268–269 Investment interest expense, 168

Investor clienteles, 10–13, 40–46 Management fees, 166, 169 Investors. See also Investor clienteles Master feeder structuring: accredited, 10-11, 11n7, 211-218 offshore master/U.S. feeder, 40-43, incentives of, 30 45-46, 95-96 institutional, 12, 17, 67–71 U.S. as withholding agent, 44–46, U.S., 12–13 U.S., in offshore funds, 17–19 U.S. master/Cayman Islands mutual IRS Form 1009-B, 94 feeder, 38–39 IRS Form 1042, 38, 44, 46, 80 U.S. master/offshore feeder, 40-45 IRS Form 1065, 44, 80, 89, 94, 96-97 Matlab, 148, 148n7, 149n9, 150-151, Schedule A, 96 150n10, 151n13, 242–245, 253–257, Schedule K, 97, 103-105, 106 263–266, 271–276. See also Open-Source CVX Schedule L, 83, 97 Schedule M, 106 Maximum drawdown, 186 Schedule M-1, 97, 104 Memorandum capital account value, Schedule M-2, 97 113, 142 Method of aggregation, 114 IRS Form 1099, 24, 193 Method of layering, 114, 115-118, IRS Form 1099B, 90 IRS Form 1116, 171 127-135, 205 compared with full netting, 159 IRS Form 3115, 115 IRS Form 5471, 221 vs. economic accounting, 204 IRS Form 8832, 40, 41, 43, 95, 96, elimination of, 207, 267–275 161-162, 221 examples showing earlier tax IRS Form SS-4, 7 payment, 154-158 in venture partnerships, 200 Kleiner, Perkins, Caufield & Byers weaknesses of, 154 Methodologies for tax allocation, Layering. See Method of layering 113-118 Layering ambiguity, 117–118 Methods of aggregation, 137–152, Lehman Brothers, 12 200. See also Full netting; Partial Leonard, Stewart, 21, 21, 18 netting Microsoft Excel, 148-149, 151, 151n12 Leverage, 83–85 Levitt, Arthur, 16311 Modified duration, 187-188 Li, Y., 149n9 Monringstar-Altvest, 25 Limited partnerships, 6–10 Murray, W., 149n9 Lipper-TASS, 25, 185 Mutual funds: London Interbank Offered Rate cost basis of shares, 193 (LIBOR), 15 defined, 5, 5n5 Long-term capital gains, advantages of, distinction from hedge funds, 170 - 17126 - 27Long Term Capital Management distribution types, 192 industry size, 25-26 (LTCM), 162–163, 163n1 Lynch, Peter, 26 and net capital losses, 192, 193 performance calculation, 175-176 regulation of, 19 Madoff, Bernard, 23–25, 23n19, 23n20, similarity to hedge funds, 176-177 24n21, 24n22, 190 Magnitude constraints, 233-235 taxable income allocations, 191-196

Net asset value (NAV) per share, 71–74, 93	Original Issue Discount (OID) interest, 89–91
Netting, 137-152, 205. See also Full	Outside tax basis, 138
netting; Partial netting New York, and hedge fund governance, 8 New York Times, 83	Partial netting, 138–141, 146–148, 225, 260 generalizing, 268–272
Norm, 232, 261, 264 2-norm, 247–248, 270	and nonabusive allocations, 262 Partial withdrawal requests, 55–56
<i>p</i> -norm, 232, 248 scaled norm, 252, 257, 274	Partner income, 113–115 Partnership accounting, 79–80
Nonqualified dividends, 164	Partnership accounting, 79–80 Partnership agreements, 47–48
Nonrecoverable foreign taxes paid by tax-exempt U.S. investors,	Partnerships, tax allocation rules, 101–103
172–173	Partner tax allocations:
Nontradable tax lots, 156 Notional principal contracts, 12	allocation formula seneralization, 108–109
Notional principal contracts, 12	distributions from partnerships
Obama administration, 22, 164, 165	owned, 12 (-125
Objective function, 262–263	fixed rec, 107–108
Och-Ziff Capital Management, 31, 76 Offshore affiliate feeder fund,	of fixed fees paid by limited partners, 121–122
13–14	or guaranteed payments to general
Offshore blocker corporation, 17	partner, 122
Offshore funds, 14–19	interest, 118–120
audit of, 97–98	IRS rules governing, 101–103
defined, 14	method of layering, 115–118, 204
and fraud protection, 16–17 organization of, 15–17	minimizing dispersion from target optimum, 262–266
protection of, 162–163	realized/unrealized income, 113–115
tax arbitrage and, 162	tax basis, 109-113
tax efficiency considerations,	tax components of income, 103-107
161–163	tax-exempt interest income, 120–121
and U.S. brokerage firms, 16 U.S. investors in, 17–19	terminology, 113 Par value, 72
U.S. master/Cayman Islands mutual	Passive Foreign Investment Corporation
feeder structure, 38–39	(PFIC) classification, 18–19, 18n12,
Oil and gas partnerships, 4	18n13, 161
Open-Source CVX, 245–248, 253–257,	Passive income/assets, 18n13
264–266, 271–276	Pass-through partnerships, 5, 9
Open-Source R, 148, 148n6, 149n9, 238–242	Pass-through taxation, 162 Performance fees, 31, 32, 108
Open-Source SDPT3, 245–248,	Black-Scholes formula valuation of,
253–257, 264–266, 271–276	74–77, 76n3
Operations research (OR) packages,	calculation of, 55-66
148–152	claw-back provision, 66–71
Ordinary dividends, 169	contingency conditions for, 60

maximum drawdown, 186 disclaimer regarding, 190 expected value, 76 modified duration, 187-188 expected value formula, 76n3 Sharpe ratio, 185, 189 and financial statements, 86 Sortino ratio, 185-186, 189 and GIPS compliance, 178 Treynor ratio, 185, 189 in historical risk-return review, value at risk, 187, 189 184–185, 188–189 Rubin, Robert E., 163n1 and IRS filings for U.S. hedge funds, Safe harbor provisions, 166, 210–211 and net asset value (NAV), 71-74 SAS/OR, 148, 148n5 and partial withdrawal requests, Scaled tax allocations, 260-261, 268 55-56 SDPT3. See Open-Source SDPT3 in returns calculations, 179-182 SEC Hedge Fund regulatory rules of tax allocation of interest, 119 2005, 2–3 tax implications of, 61-62 Section 704(b), 194, 196, 222, 231 Periodic (fixed) fees, 52-53 Securities Act of 1935, 219–220 Ponzi schemes, 23–25 Securities Investor Protection Corporation (SIPC), 23 Power of attorney, 10 "Preserve nature of gain" clause, Sharpe ratio, 33, 76, 77, 185, 189 139-140 Short credit 123 Price, T.N., 186n3 Shorting tax implications of, Private notional principal contracts, 165 123-124 Private party swaps, 12 Short position tracking, 94 Pro forma limited partner account, 184 Silicon Valley partnerships. See Venture Profit sharing fraction, 119 partnerships relation to bifurcation fraction, 119 Snapshot tax allocations, 194 Publicly traded partnerships, 5 Soft dollar arrangements, 166 Software for tax allocation Quadprog. See Matlab; Open-Source R determination Quadratic objective function, 232 Excel Solver, 148-149, 151, 151n12 Qualified dividends, 4, 122, 164, 169 Matlab, 148, 148n7, 149n9, 150–151, Qualified purchasers, 11, 11n8, 150n10, 151n13, 242–245, 253–257, 216-217, 218-219 263-266, 271-276 Open-Source CVX, 245–248, R (software). See Open-Source R 253-257, 264-266, 271-276 Realized capital gains. See Capital gains Open-Source R, 148, 148n6, 149n9, Representative limited partner account, 238-242 184 Open-Source SDPT3, 245–248, Returns after both fixed fees and 253–257, 264–266, 271–276 performance fees, 180, 181–182 SAS/OR, 148, 148n5 Returns after fixed fees, 180, 182 Solver (MS Excel), 148–149, 151, Returns before all fees, 180, 182 151n12 Returns calculation for performance Sortino, F.N., 186n3 presentation, 179-182 Sortino ratio, 30n29, 185-186, 189 Risk measures: Special purpose vehicles (SPVs), 35 beta, 185, 187, 189 Stamp duties, 171–172 Calmar ratio, 186, 186n4 Stanford University, 3, 276

Subchapter C entities, defined, 4 Union Bank of Switzerland (UBS), 20 Subchapter S entities, defined, 4 University of California at San Subcomponent reporting, 122 Francisco, 3 "Substantial economic effect", 102 Unrealized capital gains. See Capital Swiss bank accounts, 19-22 gains Unrelated Business Tax on Income T3, 245n5, 276 (UBTI), 12, 12n9, 17 Taxable income, defined, 109n3 and offshore funds, 162 Taxable interest income, 169 and offshore/offshore fund pairs, allocation formula, 107-108 Tax allocation of interest, 118-120 in venture partnerships, 197–198 Tax allocations of partner income, U.S. funds: audit of, 98-99 113-115 tax components of income from, with full netting, 229-252 with partial netting, 253–257 103-105 U.S. securities, defined 15 Tax basis for partners, 109–113, 109n2, Valuation of funds, 48–49, 71–74 Tax-book disparity, 139–143, 230–231, 248, 262–266 Value at risk n.easure, 187, 189 Tax capital account value, 113 Vandenberghe, Lieven, 146n4, Tax filing: 149n9 hedge funds, 4-6, 80-85 Ventue partnerships, 29 U.S. limited partnerships, 79–80, defined, 3-4 204 distinction from hedge funds, 49, 97, Tax-neutral allocations, 261 196-201 Tax-neutral gold standard, 263-264 financial statements, 88 Tax preference option, 259-266 and GIPS compliance, 177 Tax preference ordering, 163–167 interim illiquidity, 197 ambiguities in, 170 investments of, 199 less attractive line items, 169 investors in, 199-200 more attractive line items, 167–169 and leveraging, 199 Terminal redemption, 110 taxable cash flows in, 200-201 Tilting tax allocations, 206, 259–266 Time points in valuation, 48-49 Wash sale exclusion, 94, 132 Todd, M.J., 245n5, 276 Wealth conservation identity, 50–55 Toh, K.C., 245n5, 276 Withholding taxes: Toxic assets, 28 and foreign investors, 44-46, 80 Tracking error, 186 and offshore funds, 161 Trading partnerships, 6 Wright, M.H., 149n9 Treynor ratio, 30n29, 185, 189 True time-weighted return formula, Young, Terry W., 186n4 Tutuncu, R.H., 245n5, 276 Zero-coupon bonds, 89–90