

Omidyar Network Fund, Inc.

Financial Statements

December 31, 2013 and 2012

Omidyar Network Fund, Inc.
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December 31, 2013 and 2012

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Independent Auditor's Report

To the Board of Trustees of
Omidyar Network Fund, Inc.

We have audited the accompanying financial statements of Omidyar Network Fund, Inc. (the "Foundation"), which comprise the statements of financial position as of December 31, 2013 and 2012, and the related statements of activities and changes in net assets, and cash flows for the years then ended.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on the financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on our judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, we consider internal control relevant to the Foundation's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Foundation's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Foundation at December 31, 2013 and 2012, and the changes in its net assets and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

A handwritten signature in black ink, appearing to read "PricewaterhouseCoopers LLP".

June 27, 2014

Omidyar Network Fund, Inc.
Statements of Financial Position
December 31, 2013 and 2012

	2013	2012
Assets		
Cash and cash equivalents	\$ 18,359,894	\$ 13,158,895
Receivable for investments sold	29,166,129	15,203,826
Interest and dividends receivable	624,673	870,718
Prepaid federal excise tax	-	148,321
Investments	238,331,792	197,329,122
Program and mission related investments	<u>33,458,563</u>	<u>28,545,663</u>
Total assets	<u>\$ 319,941,051</u>	<u>\$ 255,256,545</u>
Liabilities and Net Assets		
Accounts payable and accrued liabilities	\$ 60,964	\$ 69,510
Grants payable	6,660,922	5,687,256
Deferred federal excise tax liability	<u>2,478,696</u>	<u>598,306</u>
Total liabilities	9,200,582	6,355,072
Unrestricted net assets	<u>310,740,469</u>	<u>248,901,473</u>
Total liabilities and unrestricted net assets	<u>\$ 319,941,051</u>	<u>\$ 255,256,545</u>

The accompanying notes are an integral part of these financial statements.

Omidyar Network Fund, Inc.
Statements of Activities and Changes in Net Assets
Years Ended December 31, 2013 and 2012

	2013	2012
Revenues and support		
Contributions	\$ 78,654,020	\$ 4,941,593
Contributed services and in-kind gifts	21,136,503	18,024,572
Interest and dividends, net	2,005,692	2,344,251
Net realized gains on investments	4,270,389	5,603,395
Net unrealized gains on investments	23,890,166	13,678,597
Total revenues and support	<u>\$ 129,956,770</u>	<u>\$ 44,592,408</u>
Expenses and losses		
Program expenses		
Grants	45,110,872	44,900,161
Other program expenses	9,747,435	9,196,211
Total program expenses	<u>54,858,307</u>	<u>54,096,372</u>
Administrative expenses	11,209,068	8,648,361
Federal excise tax expense	2,050,399	189,814
Total expenses	<u>68,117,774</u>	<u>62,934,547</u>
Increase (decrease) in unrestricted net assets	61,838,996	(18,342,139)
Unrestricted net assets		
Beginning of year	<u>248,901,473</u>	<u>267,243,612</u>
End of year	<u>\$ 310,740,469</u>	<u>\$ 248,901,473</u>

The accompanying notes are an integral part of these financial statements.

Omidyar Network Fund, Inc.
Statements of Cash Flows
Years Ended December 31, 2013 and 2012

	2013	2012
Cash flows from operating activities		
Change in net assets	\$ 61,838,996	\$ (18,342,139)
Adjustments to reconcile change in unrestricted net assets to net cash used in operating activities		
Net unrealized gains on investments	(23,890,166)	(13,678,597)
Net realized gains on investments	(4,270,389)	(5,603,395)
Noncash contributions received	(78,654,020)	(4,941,593)
Amortization of premium on bond investments	(76,581)	775,161
Proceeds from sale of donated securities	22,502,810	-
Changes in operating assets and liabilities		
Interest and dividends receivable	246,045	(5,154)
Prepaid federal excise tax	148,321	124,968
Accounts payable and accrued liabilities	(8,546)	(39)
Grants payable	973,666	735,623
Deferred federal excise tax liability	1,880,390	(135,734)
Net cash used in operating activities	<u>(19,309,474)</u>	<u>(41,070,899)</u>
Cash flows from investing activities		
Purchase of investments	(69,828,379)	(46,187,097)
Distributions from investments	16,398,590	5,224,823
Proceeds from sale of investments	77,940,262	80,356,719
Net cash provided by investing activities	<u>24,510,473</u>	<u>39,394,445</u>
Net change in cash and cash equivalents	5,200,999	(1,676,454)
Cash and cash equivalents		
Beginning of year	<u>13,158,895</u>	<u>14,835,349</u>
End of year	<u>\$ 18,359,894</u>	<u>\$ 13,158,895</u>
Supplemental schedule of noncash activities		
Receivable for investments sold	\$ 29,166,129	\$ 15,203,826
Contributed services and in-kind gifts	21,136,503	18,024,572

The accompanying notes are an integral part of these financial statements.

Omidyar Network Fund, Inc.

Notes to Financial Statements

December 31, 2013 and 2012

1. Organization

Omidyar Network Fund, Inc. (the "Foundation") is a 501(c)(3) entity incorporated in the State of Delaware. The purpose of the Foundation is to support organizations that employ market-based approaches to create opportunities for people to improve their lives, thereby catalyzing economic and social change.

2. Summary of Significant Accounting Policies

Basis of Accounting

The financial statements have been prepared on the accrual basis of accounting in accordance with accounting principles generally accepted in the United States of America applicable to nonprofit organizations.

Revenues, gains or losses on investments and other assets or liabilities are reported as increases or decreases in unrestricted net assets unless their use is restricted by explicit donor stipulation or by law. Expenses are reported as decreases in unrestricted net assets.

Contributions are recognized at fair value in the period received. The Foundation has been funded through contributions received from the Pierre M. Omidyar Trust ("the Trust"), a related party. To date, such contributions have been unrestricted.

Unrestricted Net Assets

Unrestricted net assets represent resources that are not subject to donor-imposed restrictions and are available to support the Foundation's activities.

Uses of Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Cash and Cash Equivalents

The Foundation considers all highly liquid investments purchased with an original maturity of three months or less to be cash equivalents. The carrying amount of cash and cash equivalents approximates fair value due to short-term maturities of the instruments. The Foundation deposits cash and cash equivalents with high credit quality financial institutions. At times, such amounts may exceed federally insured limits.

Investments

Investments, including program and mission related investments, are reported at fair value. Fair value is defined as the amount at which an asset could be exchanged between unrelated willing market participants, in an orderly transaction at the measurement date (i.e. the exit price). Investments are classified as program or mission related investments when they have a direct link to the Foundation's strategic purpose.

Omidyar Network Fund, Inc.

Notes to Financial Statements

December 31, 2013 and 2012

Securities listed on a securities exchange are valued at the last quoted sale price from the principal market on which the security is traded. Investments in open-end mutual funds are valued at the closing net asset value. Securities that trade in over-the-counter markets, including most debt and convertible securities, are valued within the range of the most recent quoted bid and ask prices or if such quotes are not available may be valued using evaluated prices determined by the Foundation's pricing services. The Foundation's pricing services may use valuation models which consider information with respect to comparable bond and note transactions, quotations from bond dealers, conversion premiums, interest rate spreads and yield curves to determine current value.

Private equity investments are not registered for public sale and are carried at estimated fair value as determined in good faith by the Foundation's management after consideration of available relevant financial, operational, and economic data. Significant factors considered in the estimation of fair value include but are not limited to the price at which the investment was acquired, the nature of the investment, local market conditions, trading values on public exchanges for comparable securities, current and projected operating performance and financing transactions subsequent to the acquisition of the investment. The inputs into the determination of fair value require significant management judgment. Due to the inherent uncertainty of these estimates, these values may differ materially from the values that would have been used had a ready market for these investments existed.

Investments in limited partnerships, which include private equity funds, venture capital funds and hedge funds are generally subject to certain withdrawal restrictions. Because no readily ascertainable market value exists for these investments, the estimated fair values are determined in good faith by the Foundation's management on the basis of the latest available valuations of the Foundation's pro-rata interest in the net assets of the partnership as determined in good faith by the general partner of each partnership.

The Foundation follows the authoritative guidance for estimating the fair value of investments in investment companies, including limited partnerships that have calculated net asset value in accordance with the specialized accounting guidance for investment companies. Accordingly, in circumstances in which the fair value of an investment in a limited partnership is not readily determinable, the Foundation estimates the fair value of an investment in a limited partnership using the net asset value of the investment without further adjustment, if the net asset value per share of the investment is determined in accordance with the specialized accounting guidance for investment companies as of the reporting entity's measurement date.

Management may determine to adjust the valuations after consideration of relevant factors that market participants would consider in a transaction for an interest in the partnership including redemption restrictions.

Investment Income

Dividends and interest are accrued as earned and are presented on the Statement of Activities and Changes in Net Assets net of investment expenses of \$503,156 and \$475,488 for 2013 and 2012, respectively.

Grants

Grants expense includes unconditional grants. Unconditional grants are expensed when grant agreements are executed. Certain grants may be subject to the grantee fulfilling specific conditions. Such conditional grants are considered commitments and are not recorded as expense until the conditions of the grant are met.

Omidyar Network Fund, Inc.
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Recent Accounting Pronouncement

In October 2012, the FASB issued Accounting Standards Update No. 2012-05, "Statement of Cash Flows (Topic 230): Not-for-Profit Entities: Classification of the Sale Proceeds of Donated Financial Assets in the Statement of Cash Flows" ("ASU 2012-05"). In accordance with ASU 2012-05, management early adopted the update and disclosed their "Proceeds from sale of donated securities" as cash flows from operating activities in line with the above guidance. In prior years, including for 2012, these proceeds were disclosed under investing activities. The adoption of this accounting pronouncement had no impact on the statements of financial position or the statements of activities and changes in net assets as of and for the years ended December 31, 2013 and 2012, respectively.

3. Investments

Investments held at December 31:

	2013	2012
Convertible securities	\$ 23,174,694	\$ 20,511,256
Public equity securities	104,838,594	34,911,826
Fixed income securities	35,587,667	41,885,572
Private equity, venture capital and hedge funds	<u>74,730,837</u>	<u>100,020,468</u>
Total investments	<u>\$ 238,331,792</u>	<u>\$ 197,329,122</u>

At December 31, 2013 and 2012, the Foundation had unfunded commitments of \$1,628,000 and \$2,367,800, respectively, related to certain private equity, venture capital and hedge funds. The unfunded portion of these commitments can be called at any time at the request of each general partner.

4. Program and Mission Related Investments

Program and mission related investments ("PRI" and "MRI") held at December 31:

	2013	2012
Private equity investments	\$ 21,352,986	\$ 18,105,242
Venture capital and private equity funds	10,105,577	7,440,421
Debt investments	<u>2,000,000</u>	<u>3,000,000</u>
Total investments	<u>\$ 33,458,563</u>	<u>\$ 28,545,663</u>

At December 31, 2013 and 2012, the Foundation had unfunded commitments of \$9,099,999 and \$8,707,185, respectively, related to investments in limited partnerships. The unfunded commitments to private equity and venture capital funds can be called at any time at the request of the general partners and are not accrued until called.

Omidyar Network Fund, Inc.
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5. Investment Valuation

The accounting standard over fair value measurements established a framework for measuring fair value, and expands disclosures about fair value measurements. The standard prioritizes, within the measurement of fair value, the use of market-based information over entity specific information and establishes a three-level hierarchy for fair value measurements based on the nature of inputs used in the valuation of an asset or liability as of the measurement date.

The three-level hierarchy for fair value measurements is defined as follows:

- Level 1 inputs to the valuation methodology are quoted prices (unadjusted) for identical assets or liabilities in active markets;
- Level 2 inputs to the valuation methodology include quoted prices for similar assets or liabilities in active markets, and inputs that are observable for the asset or liability other than quoted prices, either directly or indirectly, including inputs in markets that are not considered to be active; and
- Level 3 inputs to the valuation methodology are unobservable and significant to the fair value measurement. The inputs into the determination of fair value require significant management judgment.

An investment's categorization within the valuation hierarchy is based upon the lowest level input that is significant to the fair value measurement.

The following table presents the investments carried at fair value on the Statement of Financial Position as of December 31, 2013 (as described above):

	Assets at Fair Value as of December 31, 2013			
	Level 1	Level 2	Level 3	Total
Convertible securities	\$ -	\$ 23,174,694	\$ -	\$ 23,174,694
Public equity securities	104,838,594	-	-	104,838,594
Fixed income securities	-	35,587,667	-	35,587,667
Private equity, venture capital and hedge funds	-	51,300,356	23,430,481	74,730,837
PRI and MRI - private equity	-	-	21,352,986	21,352,986
PRI and MRI - private equity and venture capital funds	-	-	10,105,577	10,105,577
PRI and MRI - debt	-	-	2,000,000	2,000,000
	<u>\$ 104,838,594</u>	<u>\$ 110,062,717</u>	<u>\$ 56,889,044</u>	<u>\$ 271,790,355</u>

There were no transfers of assets into and out of Level 1 and 2 of the fair value hierarchy in 2013.

Omidyar Network Fund, Inc.
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The following table presents the investments carried at fair value on the Statement of Financial Position as of December 31, 2012 (as described above):

	Assets at Fair Value as of December 31, 2012			
	Level 1	Level 2	Level 3	Total
Convertible securities	\$ -	\$ 20,511,256	\$ -	\$ 20,511,256
Public equity securities	34,911,826	-	-	34,911,826
Fixed income securities	-	41,885,572	-	41,885,572
Private equity, venture capital and hedge funds	-	78,134,844	21,885,624	100,020,468
PRI and MRI - private equity	-	-	18,105,242	18,105,242
PRI and MRI - private equity and venture capital funds	-	-	7,440,421	7,440,421
PRI and MRI - debt	-	-	3,000,000	3,000,000
	<u>\$ 34,911,826</u>	<u>\$ 140,531,672</u>	<u>\$ 50,431,287</u>	<u>\$ 225,874,785</u>

There were no transfers of assets into and out of Level 1 and 2 of the fair value hierarchy in 2012.

Fair Value Measurements Using Level 3 Inputs

The following table includes a roll-forward of the amounts in the Statement of Financial Position for the year ended December 31, 2013 (including the change in fair value) for investments classified within Level 3 of the fair value hierarchy.

	Private Equity, Venture Capital and Hedge Funds	PRI and MRI - Private Equity	PRI and MRI - Private Debt	PRI and MRI - Private Equity and Venture Capital Funds	Total
Balance at December 31, 2012	\$ 21,885,624	\$ 18,105,242	\$ 3,000,000	\$ 7,440,421	\$ 50,431,287
Purchases	795,460	1,113,503	-	3,143,945	5,052,908
Sales and distributions	(5,333,788)	-	-	(1,121,901)	(6,455,689)
Maturities and conversions		1,000,000	(1,000,000)	-	
Gains/(Losses)					
Realized	3,267,535	-	-	631,902	3,899,437
Unrealized	2,815,650	1,134,241	-	11,210	3,961,101
Balance at December 31, 2013	<u>\$ 23,430,481</u>	<u>\$ 21,352,986</u>	<u>\$ 2,000,000</u>	<u>\$ 10,105,577</u>	<u>\$ 56,889,044</u>

The change in unrealized gains or losses for the period for Level 3 investments held at December 31, 2013 included in the changes in net assets was the same as the total change in unrealized gains or losses for Level 3 investments for the year ended December 31, 2013.

The following table includes a roll-forward of the amounts in the Statement of Financial Position for the year ended December 31, 2012 (including the change in fair value) for investments classified within Level 3 of the fair value hierarchy.

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	Private Equity, Venture Capital and Hedge Funds	PRI and MRI - Private Equity	PRI and MRI - Private Debt	PRI and MRI - Private Equity and Venture Capital Funds	Total
Balance at December 31, 2011	\$ 24,554,878	\$ 12,954,505	\$ 2,000,000	\$ 6,095,930	45,605,313
Purchases	802,058	5,629,000	1,000,000	1,601,174	9,032,232
Sales and distributions	(4,774,550)	-	-	(612,878)	(5,387,428)
Gains/(Losses)					
Realized	3,461,977	-	-	419,956	3,881,933
Unrealized	(2,158,739)	(478,263)	-	(63,761)	(2,700,763)
Balance at December 31, 2012	\$ 21,885,624	\$ 18,105,242	\$ 3,000,000	\$ 7,440,421	\$ 50,431,287

The change in unrealized gains or losses for the period for Level 3 investments held at December 31, 2012 included in the changes in net assets was the same as the total change in unrealized gains or losses for Level 3 investments for the year ended December 31, 2012.

All net realized and unrealized gains and losses are included within revenues and support in the Statement of Activities and Changes in Net Assets.

The Foundation uses significant unobservable inputs in the fair value measurements of certain direct private equity investments. The following table provides quantitative information about the valuation techniques and significant unobservable inputs used to determine the fair value of such investments at December 31, 2013.

	Fair Value	Valuation Technique(s)	Unobservable Input	Assumptions
Direct private equity investment - education	\$ 9,441,101	Option pricing model	Expected volatility Time to exit (years)	60.0% 3
Direct private equity investment - financial inclusion	\$ 1,993,612	Market comparable	Book value multiple	1.5

The level 3 assets are mainly valued using unobservable but non-quantitative inputs. These assets include financial instruments for which determination of fair value is based on prices from prior transactions or third party pricing information without adjustment from management and financial instruments for which fair value is determined using the NAV as a practical expedient.

The following table provides quantitative information about the valuation techniques and significant unobservable inputs used to determine the fair value of such investments at December 31, 2012.

	Fair Value	Valuation Technique(s)	Unobservable Input	Assumptions
Direct private equity investment - education	\$ 9,441,101	Option pricing model	Expected volatility Time to exit (years)	60.0% 3
Direct private equity investment - financial inclusion	\$ 1,783,573	Market comparable	Book value multiple	1.5

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The Foundation uses net asset value (NAV) to determine the fair value of its investments in limited partnerships. The following table lists such investments by major category at December 31, 2013:

	Number of funds	Fair Value	Unfunded Commitments	Redemption Terms	Redemption Restrictions in Place at Year End
(a) Hedge funds - equity strategies	2	\$ 20,062,404	\$ -	Ranges from monthly redemption with 35 days' notice to annual redemption with 90 days' notice	None
(b) Hedge funds - diversified	2	14,721,704	-	Ranges from monthly redemption with 45 days' notice to semiannual redemption with 90 days' notice	None
(c) Private equity and venture capital funds - U.S.	6	23,430,481	1,628,000	Not redeemable	N/A
(d) Hedge funds - debt strategies	2	16,516,247		Range from monthly redemption with 45 days' notice to annual redemption with 90 days' notice	None
(e) PRI and MRI - Private equity funds - non U.S.	5	\$ 10,105,577	\$ 9,099,999	Not redeemable	N/A
	<u>17</u>	<u>\$ 84,836,413</u>	<u>\$ 10,727,999</u>		

Omidyar Network Fund, Inc.
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The following table lists such investments by major category at December 31, 2012:

	Number of funds	Fair Value	Unfunded Commitments	Redemption Terms	Redemption Restrictions in Place at Year End
(a) Hedge funds - equity strategies	4	\$ 40,002,900	\$ -	Ranges from monthly redemption with 35 days' notice to annual redemption with 90 days' notice	None
(b) Hedge funds - diversified	3	21,380,826	-	Ranges from monthly redemption with 45 days' notice to semiannual redemption with 90 days' notice	None
(c) Private equity and venture capital funds - U.S.	6	21,885,624	2,367,800	Not redeemable	N/A
(d) Hedge funds - debt strategies	2	16,751,118	-	Range from monthly redemption with 45 days' notice to annual redemption with 90 days' notice	None
(e) PRI and MRI - Private equity funds - non U.S.	4	7,440,421	8,707,185	Not redeemable	N/A
	<u>19</u>	<u>\$ 107,460,889</u>	<u>\$ 11,074,985</u>		

- (a) This category includes investments in hedge funds that primarily pursue equity value strategies that provide superior risk-adjusted returns.
- (b) This category includes investments in a hedge fund that pursues multiple strategies to diversify risks and reduce volatility including U.S. equity value and growth opportunities, distressed debt, arbitrage and emerging market equities.
- (c) This category includes several private equity and venture capital funds that invest primarily in U.S. private companies. Distributions from these funds will be received as the underlying investments of the funds are liquidated.
- (d) This category includes investments in hedge funds that primarily invest in multi-credit debt strategies that include investments in distressed debt.
- (e) This category includes investments in private equity funds that invest primarily in microfinance institutions in emerging economies and small to medium enterprises within India. Distributions from these funds will be received as the underlying investments of the funds are liquidated.

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6. Related Party Transactions

The Trust donated marketable securities with total fair value of \$78,654,020 to the Foundation in 2013.

During 2013 and 2012, Omidyar Network Services LLC, a subsidiary of Omidyar Network LLC, and an affiliated entity of the Foundation, provided program and general and administrative support to and paid for professional legal costs on behalf of the Foundation. Contributed services and in-kind gifts are allocated to the Foundation based on the percentage of the Foundation's annual grant and program and mission related investment transactions to the total annual transactions of both the Foundation and Omidyar Network LLC. The allocated amount may fluctuate significantly as the transaction mix changes from year to year. The amount of contributed services and in-kind gifts from Omidyar Network Services LLC is recognized as support. The support and related expense for the years ended December 31, 2013 and 2012 totaled \$20,923,603 and \$17,816,046, respectively. In addition, other affiliated entities and related parties provided in-kind services related to investment management and travel of \$212,900 during 2013 and \$208,525 during 2012, to the Foundation.

7. Grants and Support

Grant expenses for December 31, 2013 are as follows:

	2013	2012
Grant payments	44,881,834	\$ 44,164,437
Less: amounts committed in previous years and paid	(4,312,916)	(2,961,632)
Future payments committed in the current year on unconditional grants	5,595,422	3,697,356
Released amount committed in PY	(208,940)	-
Refunded grants paid in previous year	<u>(844,528)</u>	<u>-</u>
Grant expenses	<u>\$ 45,110,872</u>	<u>\$ 44,900,161</u>

Payables related to unconditional grants are due as follows: \$4,503,186 due in 2014, \$1,026,000 due in 2015 and \$1,000,000 due in 2016. All grants payable are recorded at face value, which, as of December 31, 2013 and December 31, 2012 was immaterially different from present value.

As of December 31, 2013 and 2012, the Foundation had unfunded commitments of \$42,273,450 and \$46,839,880, respectively, related to conditional grants. Future installments are payable upon the satisfaction of certain conditions and therefore, will not be accrued until such conditions have been met.

In 2012, the Foundation also provided financial guarantee for one organization in the form of a letter of credit. The letter of credit was issued by a commercial bank, subject to periodic renewal. The arrangement expires on October 25, 2019. As of December 31, 2013, the face amount of the letter of credit was \$2,000,000.

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8. Taxes

Omidyar Network Fund, Inc. is a private foundation and qualifies as a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code of 1954, as amended, and from state income taxes under Section 23701(d) of the Revenue and Taxation Code of the State of California, respectively. Private foundations are subject to a federal excise tax on net investment income and may reduce their federal excise tax rate from 2% to 1% if the foundation's charitable expenditures exceed a specified minimum amount based on the foundation's average expenditures over the preceding five years. The Foundation was subject to 1% excise rate for both 2013 and 2012. At December 31, 2013 and 2012, deferred excise tax liabilities of 2% were recognized on net unrealized gains on investments. Certain investments provide unrelated business income, which is subject to unrelated business income tax. For the years ended December 31, 2013 and 2012, the unrelated business income provided by investments was immaterial.

The expenses for federal excise tax are as follows:

	2013	2012
Current	\$ 216,096	\$ 325,548
Deferred	<u>1,834,303</u>	<u>(135,734)</u>
Federal excise tax expense	<u>\$ 2,050,399</u>	<u>\$ 189,814</u>

The Foundation believes that it has appropriate support for the excise tax positions taken and, as such, does not have any uncertain tax positions that result in a material impact on the Foundation's financial position or changes in net assets.

9. Subsequent Events

The Foundation has evaluated subsequent events for the period from December 31, 2013 through June 27, 2014, the date the financial statements were available to be issued. There have been no subsequent events, which would require the adjustment of any significant estimate and related disclosures.