Ellington Financial

SAMPLE PARTNER A 53 FOREST AVE

OLD GREENWICH, CT 06870

For Questions Regarding Your Tax Package Contact Partner DataLink

> Partner DataLink Ellington Financial LLC PO Box 8447 Hermitage, TN 37076-8447

> > Phone: (855) 237-3734 Fax: (215) 982-6302

Email: <u>EllingtonK1Help@Deloitte.com</u> Website: <u>www.partnerdatalink.com/Ellington</u>

To Ellington Financial LLC Shareholders:

Enclosed is your Schedule K-1, which reflects the activity from your investment in Ellington Financial LLC (NYSE:EFC). As a shareholder, you are required to report this activity on your federal and state income tax returns. To assist you in reporting this activity, we have prepared this 2016 Tax Package, which contains certain information relating to your ownership of EFC shares.

In the Tax Package, EFC is providing the following documents to you:

- (1) 2016 Tax Reporting Package Frequently Asked Questions
- (2) 2016 Schedule K-1 (Form 1065)
- (3) 2016 Supplemental Information (contains details about the amounts reported on Schedule K-1)
- (4) 2016 Schedule K-1 Footnotes (Form 926 Information if applicable)
- (5) 2016 Ownership Schedule
- (6) 2016 Sales Schedule (if applicable)

Please carefully review the information on your 2016 Ownership Schedule. This schedule contains the history of shares you bought or sold by date and number of shares as reported to EFC by your broker or our transfer agent through December 31, 2016. We rely on purchase and sale information obtained from the brokers and transfer agent to prepare the tax information reported to you. If the information provided by the brokers and transfer agent is incorrect, then the information reported to you, as well as the information reported to the Internal Revenue Service, will also be incorrect. If the information is inaccurate, please contact us as indicated on the 2016 Ownership Schedule to correct such information, and we will issue you a corrected tax package.

This package is intended to be a general guide to reporting your share of our taxable income and any gain or loss from the sale of our shares based on our understanding of existing tax laws and regulations. EFC does not provide advice on tax matters to its shareholders, and this package is not intended to provide tax advice. Therefore, before you prepare and file your income tax return, you are strongly urged to consult your tax advisor with regard to the U.S. federal income tax consequences of holding our shares and the related tax reporting requirements.

If you have any questions concerning your Schedule K-1 or this tax package, please contact Partner DataLink at (855)-237-3734 during the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday, Central Time, or visit our website at www.PartnerDataLink.com/Ellington.

Ellington Financial LLC

2016 Income Tax Reporting Package Frequently Asked Questions

INTRODUCTION

Ellington Financial LLC (EFC) is a publicly traded limited liability company that is not subject to federal or state income tax. Instead, shareholders are required to report their allocable share of EFC's items of taxable income, gain, deduction or loss on their individual income tax returns as though each shareholder, who is treated as a partner for tax purposes, had incurred such items directly.

The enclosed tax package consists of your IRS Schedule K-1 (Form 1065), Supplemental Information Schedule, Footnotes, Ownership Schedule and Sales Schedule for EFC's tax year ending December 31, 2016. Please read the Supplemental Information Schedule, Footnotes, Ownership Schedule and Partner's IRS Instruction Booklet (which is also enclosed) carefully before filing your 2016 Federal Income Tax Return. (Please read the Sales Schedule if you disposed of shares in 2016.)

Individuals should proceed directly to the Ownership Schedule and confirm the accuracy of their ownership information. Please report any errors to EFC Partner DataLink at the address, phone number or website listed in the Ownership Schedule Summary.

Next, individuals should review their Federal Schedule K-1 and Supplemental Information Schedule and Footnotes. If any boxes of the 2016 Schedule K-1 or the Supplemental Information Schedule show an amount, then you should report the amount on the applicable box's corresponding Form or Schedule that you will attach to your Form 1040.

Finally, if you disposed of your shares prior to January 1, 2017, you should utilize the Sales Schedule and applicable summary to determine your taxable gain or loss on share dispositions. Please contact your tax advisor if you have any questions regarding the applicable tax treatment of any item on the enclosed schedules. Questions relating specifically to the Schedule K-1 Information should be directed to: **EFC Partner DataLink at (855) 237-3734.**

IMPORTANT: The amount of your taxable income will not correspond to the amount of cash distributed to you during the year.

This Individualized Income Tax Reporting Package is being provided to Registered Owners, (i.e., shareholders who have received a numbered certificate of ownership representing their shares) and to Beneficial Owners (i.e., shareholders whose shares are held in a brokerage or other nominee account) whose ownership information was provided to EFC by their brokers or nominees.

- Q. Do I report any cash I received as my taxable income?
- A. No. You should report instead the income items shown on your Schedule K-1 provided to you by EFC.
- Q. Is the amount of cash I received equal to the amount I have to report on my individual income tax return?
- A. No, The cash payments you received are treated as partnership distributions (nontaxable reductions to your tax basis) for tax purposes. The amount you are required to include in your individual income tax return is your share of EFC's income and related items, allocated based on the number of shares you owned during 2016, and is reported on your Schedule K-1. The amount of your taxable income will not correspond to the amount of cash distributed to you during the year, if any.

Q. What is a Schedule K-1?

- A. EFC is a publicly traded limited liability company taxed as a partnership. A partner's share of partnership income and expenses are reported on Schedule K-1 and flow through to EFC's shareholders to be reported on their individual tax returns. EFC is required to file a Form 1065 with the IRS that includes a Schedule K-1 for each shareholder reporting their respective tax information, and is required to provide Schedule K-1 to its shareholders.
- Q. Why am I receiving a Schedule K-1 rather than a Form 1099-DIV?
- A. Forms 1099-DIV are used by corporations to report dividends paid to their shareholders. EFC is taxed as a partnership, not as a corporation. Schedules K-1 are used by partnerships to report taxable income, gain, deduction or loss to their partners. EFC shareholders are treated as partners for tax purposes, and receive Schedules K-1.
- Q. How is my basis affected by cash distributions and partnership net income?
- A. The cash distributions you receive decrease your basis in EFC. Your basis is increased by your share of EFC's taxable income or decreased by your share of EFC's taxable loss allocated to you on your Schedule K-1.
- Q. Why do you report Unrelated Business Taxable Income (UBTI) amounts?
- A. UBTI is a tax-exempt organization's (including IRA's, Keogh and other qualified retirement plans) distributive share of our gross income and allowable deductions which is considered to be unrelated to the regular activities of the tax-exempt organization, and is generally taxable to those organizations. Tax-exempt organizations subject to this tax should report the UBTI amounts in the appropriate places on Schedule E of their Forms 990-T. Such income is includable in the organization's taxable income, but may be offset by a \$1,000 deduction. Please consult your tax adviser if you sold your EFC shares and need to calculate how much of the gain (loss) on disposition is UBTI.
- Q. What is income from Section 475(f)?
- A. EFC has made an election to have the "mark-to-market" rules apply to its securities trading under Section 475(f). Income from such securities trading is treated as ordinary income instead of capital gain. All gains and losses pursuant to this election have been included on Schedule K-1, Box 11, Code F. Not all of EFC's securities qualify for the election. Income from those securities that do not qualify for the election may generate capital gains and losses. Such capital gains are included on Schedule K-1, boxes 8 and 9.
- Q. What should I do if the information in my tax package is incorrect?
- A. You may make any corrections directly onto the Ownership Schedule and return it to EFC by May 15, 2017 at the address given in the instructions. You may also call (855) 237-3734 or fax corrections to (215) 982-6302. EFC will use the information on the corrected Ownership Schedule to update its records and will send you corrected tax information.
- Q. What is EFC's tax year and how does that affect my share of partnership income?
- A. EFC is on a December 31 calendar year end for income tax purposes. Therefore, the enclosed tax information should be reported in your 2016 income tax return. If you are a fiscal year taxpayer, the tax information items should be reported in your tax return for your fiscal year which includes December 31, 2016.

				Final K-1		ded K-1		OMB No. 1545-0123
	edule K-1 201	6 [Pa		Partner's Share			
•	iii 1005) — ° - °				Deductions, Cre			
	tment of the Treasury For calendar year 2016, or tax al Revenue Service		1	Ordinary	business income (loss)	15	5 Credits	•
TICITIC	year beginning	, 2016			17,3	_		
	ending, 20		2	ivet renta	I real estate income (los	is)		
Part	tner's Share of Income, Deductions,		3	Other net	t rental income (loss)	16	Foreign	transactions
Cre	dits, etc. ▶ See back of form and separate instru	uctions.	Ū	Other rich	rental moonie (1033)	l i		29,047
P	art I Information About the Partnership		4	Guarante	ed payments	_		20,011
	Partnership's employer identification number					C	;	2,115
	0489289		5	Interest in	ncome			<u> </u>
	Partnership's name, address, city, state, and ZIP code				26	31 C)	1,225
	INGTON FINANCIAL LLC		6a	Ordinary	dividends			
	OREST AVE					G	;	3,288
OLD	GREENWICH, CT 06870		6b	Qualified	dividends	١.		
						ŀ	1	20,236
	IRS Center where partnership filed return		7	Royalties	•			404
OGE				NI-4 -b		<u> </u>		421
D	Check if this is a publicly traded partnership (PTP)		8	Net snort	t-term capital gain (loss) 93			
D	art II Information About the Partner		9a	Not long	term capital gain (loss)	17	7 Altornat	ive minimum tax (AMT) items
			эа	Net long-	1,17		Alternat	ive millimum tax (Alvir) items
	Partner's identifying number		9b	Collectib	les (28%) gain (loss)	•		
	Partner's name, address, city, state, and ZIP code			00001	.00 (2070) ga (1000)			
	MPLE PARTNER A		9c	Unrecapt	tured section 1250 gain			
53 F	OREST AVE				· ·			
OLD	GREENWICH, CT 06870		10	Net secti	on 1231 gain (loss)	18	3 Tax-ex	empt income and
							nonded	ductible expenses
G	General partner or LLC X Limited partner or other LLC	~ I	11	Other inc	ome (loss)			
	member-manager member		F*		(17,86	2)		
Н								
	What type of entity is this partner? INDIVIDUAL					_) Distribu	41
12	If this partner is a retirement plan (IRA/SEP/Keogh/etc.), check here	\Box	12	Section 1	179 deduction	19		19,500
			12	Section	179 deduction		\	19,500
J	Partner's share of profit, loss, and capital (see instructions): Beginning Ending		13	Other de	ductions			
	Profit 0.029788 % 0.03054	45 %	H*		3,28	38 20	Other i	nformation
	Loss 0.029788 % 0.03054							
	Capital 0.029788 % 0.03054		K		24	14 A	L	261
K	Partner's share of liabilities at year end:					B		244
	Nonrecourse \$		14	Self-emp	loyment earnings (loss)			
	Qualified nonrecourse financing . \$					V	*	STMT
	Recourse \$							(4.050)
			**	L		Y		(1,656)
L	Partner's capital account analysis:	,,,,	^Se	e attach	ed statement for a	idditio	nal infori	mation.
	Beginning capital account \$ 180, Capital contributed during the year	090						
	Current year increase (decrease) . \$ (1,6	(54)						
			<u>~</u>					
	Ending capital account \$ 159,	742	ō					
			Jse					
	▼ Tax basis		For IRS Use Only					
	Other (explain)		드					
			В					
M	Did the partner contribute property with a built-in gain or loss?							
	☐ Yes ☐ No							
	If "Yes," attach statement (see instructions)							

Cat. No. 11394R

Schedule K-1 (Form 1065) 2016 Page **2**

This list identifies the codes used on Schedule K-1 for all partners and provides summarized reporting information for partners who file Form 1040. For detailed reporting and filing information, see the separate Partner's Instructions for Schedule K-1 and the instructions for your income tax return.

Report on Code 1. Ordinary business income (loss). Determine whether the income (loss) is Empowerment zone passive or nonpassive and enter on your return as follows. Report on employment credit Passive loss See the Partner's Instructions Credit for increasing research Passive income Schedule E, line 28, column (g) activities See the Partner's Instructions Nonpassive loss Schedule E, line 28, column (h) Credit for employer social Nonpassive income Schedule E, line 28, column (j) security and Medicare taxes Net rental real estate income (loss) See the Partner's Instructions Backup withholding Other net rental income (loss) Other credits Schedule E, line 28, column (g) 16. Foreign transactions Net income See the Partner's Instructions Net loss A Name of country or U.S. Schedule E, line 28, column (j) **Guaranteed payments** possession 5. Interest income Form 1040, line 8a Gross income from all sources Form 1116, Part I 6a. Ordinary dividends Form 1040, line 9a Gross income sourced at 6b. Qualified dividends Form 1040, line 9b partner level Schedule É, line 4 Royalties Foreign gross income sourced at partnership level 8. Net short-term capital gain (loss) Schedule D, line 5 Passive category 9a. Net long-term capital gain (loss) 9b. Collectibles (28%) gain (loss) Schedule D, line 12 General category Form 1116. Part I 28% Rate Gain Worksheet, line 4 Other (Schedule D instructions) Deductions allocated and apportioned at partner level 9c. Unrecaptured section 1250 gain See the Partner's Instructions Interest expense , Form 1116, Part I Net section 1231 gain (loss) Form 1116, Part I 10. See the Partner's Instructions н Other Other income (loss) 11. Deductions allocated and apportioned at partnership level to foreign source Code income A Other portfolio income (loss) See the Partner's Instructions Passive category Involuntary conversions See the Partner's Instructions В General category Form 1116, Part I Sec. 1256 contracts & straddles Form 6781, line 1 Other Mining exploration costs recapture See Pub. 535 Other information Form 1040, line 21 or Form 982 Cancellation of debt Form 1116, Part II Е Total foreign taxes paid Form 1116, Part II See the Partner's Instructions Other income (loss) М Total foreign taxes accrued Section 179 deduction See the Partner's Instructions N Reduction in taxes available for credit Form 1116, line 12 Other deductions Foreign trading gross receipts Form 8873 A Cash contributions (50%) Extraterritorial income exclusion Form 8873 Cash contributions (30%) В Other foreign transactions See the Partner's Instructions Noncash contributions (50%) 17. Alternative minimum tax (AMT) items Noncash contributions (30%) See the Partner's Post-1986 depreciation adjustment Е Capital gain property to a 50% Instructions В Adjusted gain or loss See the Partner's organization (30%) C Depletion (other than oil & gas) Instructions and Capital gain property (20%) Oil, gas, & geothermal-gross income the Instructions for Contributions (100%) G Oil, gas, & geothermal-deductions Form 6251 н Investment interest expense Form 4952, line 1 Other AMT items Tax-exempt income and nondeductible expenses Deductions-royalty income Schedule E, line 19 Section 59(e)(2) expenditures See the Partner's Instructions Tax-exempt interest income Form 1040, line 8b Deductions-portfolio (2% floor) Schedule A, line 23 Other tax-exempt income See the Partner's Instructions Deductions—portfolio (other) Schedule A, line 28 Nondeductible expenses See the Partner's Instructions Amounts paid for medical insurance Schedule A, line 1 or Form 1040, line 29 19. Distributions Educational assistance benefits See the Partner's Instructions Cash and marketable securities Dependent care benefits Form 2441, line 12 Distribution subject to section 737 See the Partner's Instructions Preproductive period expenses See the Partner's Instructions Other property Commercial revitalization deduction Other information from rental real estate activities See Form 8582 instructions Investment income Form 4952, line 4a Pensions and IRAs See the Partner's Instructions В Form 4952, line 5 Investment expenses See the Partner's Instructions Reforestation expense deduction Fuel tax credit information Form 4136 Domestic production activities Qualified rehabilitation expenditures See Form 8903 instructions information (other than rental real estate) See the Partner's Instructions Qualified production activities income Form 8903, line 7b Basis of energy property See the Partner's Instructions Employer's Form W-2 wages Form 8903, line 17 Recapture of low-income housing W Other deductions See the Partner's Instructions credit (section 42(j)(5)) Form 8611, line 8 G Self-employment earnings (loss) Recapture of low-income housing **Note:** If you have a section 179 deduction or any partner-level deductions, see the Partner's Instructions before completing Schedule SE. credit (other) Form 8611, line 8 Recapture of investment credit See Form 4255 See the Partner's Instructions A Net earnings (loss) from Recapture of other credits self-employment Schedule SE, Section A or B J Look-back interest - completed long-term contracts See Form 8697 R Gross farming or fishing income See the Partner's Instructions Look-back interest-income forecast See the Partner's Instructions C Gross non-farm income method See Form 8866 Credits Dispositions of property with A Low-income housing credit section 179 deductions (section 42(j)(5)) from pre-2008 Recapture of section 179 deduction buildings Interest expense for corporate Low-income housing credit partners (other) from pre-2008 buildings Section 453(I)(3) information Low-income housing credit Section 453A(c) information (section 42(j)(5)) from Q Section 1260(b) information post-2007 buildings See the Partner's Instructions Interest allocable to production Low-income housing credit See the Partner's expenditures (other) from post-2007 Instructions CCF nonqualified withdrawals buildings Qualified rehabilitation Depletion information—oil and gas expenditures (rental real estate) Unrelated business taxable income Other rental real estate credits Precontribution gain (loss) G Other rental credits Section 108(i) information н Undistributed capital gains credit Form 1040, line 73; check box a Net investment income Biofuel producer credit

Work opportunity credit

Disabled access credit

See the Partner's Instructions

Other information

ELLINGTON FINANCIAL LLC

PARTNER NAME: SAMPLE PARTNER A

PARTNER FEDERAL ID & ENTITY TYPE: APPLD FOR / INDIVIDUAL

CUSTODIAN FEDERAL ID (IF APPLICABLE):

Line	Description	Amount
	Ordinary business income (loss)	
	U.S. Government Interest as Non-qualified Dividend Income	-
	U.S. Sourced Interest Income	21,299
	U.S. Government Interest	32
	U.S. Sourced Non-qualified Dividend Income	122
	Foreign Sourced Non-qualified Dividend Income	1,225
	Management Fees	(2,676)
	Incentive Fees	-
	Trade Or Business Expenses	(2,893)
	PFIC QEF Income	144
	Guaranteed Payments Received – Not Treated as Portfolio Interest	118
1	Total Ordinary business income (loss)	17,371
	Other Income (Loss)	
	Section 475(F) Mark-to-Market Gain (Loss)	(14,811)
	Section 475(F) Mark-to-Market Gain (Loss) – U.S. Treasuries	20
	Swap Income (Loss)	(5,423)
	Sub-Part F Income	2,344
	Other Income	8
	Other Loss	-
11F	Total Other Income (Loss)	(17,862)
	Investment Interest Expense	
	Investment interest related to US Treasuries	9
	Other Investment Interest expense	3,279
13H	Total Investment Interest Expense	3,288
	<u>Unrelated Business Taxable Income</u> (UBTI, see Frequently Asked Questions page)	
20V1	UBTI – Ordinary	(2,643)
20V2	UBTI – Capital	1,595

PARTNER NAME: SAMPLE PARTNER A

PARTNER FEDERAL ID & ENTITY TYPE: APPLD FOR / INDIVIDUAL

CUSTODIAN FEDERAL ID (IF APPLICABLE):

Ellington Financial LLC ("EFC") has taken the tax return filing position that its operating partnership's direct activities generally constitute a trade or business of trading in securities for federal income tax purposes. As such, EFC's expenses from trader activities, other than interest, have been included on Schedule K-1, Box 1 as an element of ordinary business income / (loss). EFC's share of expenses from investment partnerships and from its non-trader activities have been included in Box 13K. Furthermore, EFC is subject to a mark to market election as a trader in securities under IRC Section 475(f)(1). All gains and losses (which are ordinary gains) pursuant to this election have been included on Schedule K-1, Box 11, Code F. Capital gains and losses on securities not covered by the trader election have been included on Schedule K-1, Boxes 8 and 9A.

Summarized reporting information for shareholders who file Form 1040 may be found on Schedule K-1, Page 2. Please note that any income or loss included in Box 11 (Other income (loss)) should be combined (or netted) with the amount included in Box 1 and reported on Form 1040, Schedule E, Line 28, column (h) or (j). Interest expense in Box 13H will generally be reported on Form 1040, Schedule E, Part II, Line 28 by listing "Investment Interest Expense – Ellington Financial LLC" in column (a), and entering the interest expense amount in Box 13h on Schedule E, Part II, Line 28, column (h) (unless the interest expense is limited by the investment interest expense limitation on Form 4952, in which case the limited amount should be reported).

Please note that income from the trading of securities is considered non-passive income. Thus, none of the distributive share items reported on this Schedule K-1 are considered as derived from a passive activity under Treasury Regulation Section 1.469-1T(e)(6). Accordingly, loss allocated to you on this Schedule K-1 generally will not be subject to passive activity loss limitations.

Investment income/expense items in Box 1, 8 and 11 have not been included in Boxes 20, Codes A or B per the IRS instructions. You may need to include those amounts when preparing Form 4952.

PART III, BOX 20 OTHER INFORMATION, CODE Y – NET INVESTMENT INCOME: The partnership is engaged in trading and investing in financial instruments. As such, all of the income/loss from these activities are subject to the net investment income tax under IRC Section 1411. Therefore, all of the amounts on this Schedule K-1 generally need to be reported by individuals, estates and trusts on Form 8960, in addition to the forms indicated on page 2 of Schedule K-1.

No amounts reported on Schedule K-1 represent income effectively connected with a U.S. trade or business. The partnership did not generate any items of income or loss that were derived from or connected with sources from within any state. However, as with any items of income or loss, these may be taxable in your state of domicile.

Please consult your tax advisor.

Form 926 Information: Return by a U.S. Transferor of Property to a Foreign Corporation

Information Reporting Required Under Section 6038

Ellington Financial LLC invested in foreign corporations in transactions described in Section 6038 during the year ended 12/31/2016. If you are a U.S. domestic partner and are deemed to have contributed \$100,000 or more in fair market value to a foreign corporation you may be required to include Form 926 with your tax return. Please consult your tax advisor.

The following information is being provided to assist you with Form 926. If you believe you have a filing requirement, the additional information needed to complete the Form can be obtained by contacting Partner DataLink at (855)-237-3734 or downloaded at www.partnerdatalink.com/Ellington.

Transferee Entity	Type of Property	Fair Market Value	Cost or Other Basis
Debt Resolution Corp S.a r.l Compartment I	Cash	1,564	1,564
Debt Resolution Corp S.a r.l Compartment K	Cash	2,926	2,926
Chronos Strategies S.A. variable rate notes due in 2030	Cash	460	460
EF Cayman Holdings Ltd.	Cash	57,499	57,499
EF Cayman Holdings 3 Ltd.	Partnership Interest	2,187	4,266

ELLINGTON FINANCIAL LLC

PARTNER NAME: SAMPLE PARTNER A

PARTNER FEDERAL ID & ENTITY TYPE: APPLD FOR / INDIVIDUAL

CUSTODIAN FEDERAL ID (IF APPLICABLE):

This schedule details your transactional history regarding shares of Ellington Financial LLC, as reported to the Partnership by your broker or our transfer agent through December 31, 2016. This schedule is limited to all shares that are reported as owned by the partner federal identification number and entity type shown above.

NOTE: A separate schedule and related Tax Package may be issued for any other entity types associated with the partner federal identification number shown above.

The transactional information contained below has been utilized to prepare this Tax Package. If this transactional information is incorrect, then the information reported in this Tax Package (as well as the information reported to the IRS) may be incorrect. To report any errors or inaccuracies, please contact Partner DataLink by email at EllingtonK1Help@Deloitte.com, by phone at (855) 237-3734 or by mail at Partner DataLink, Ellington Financial LLC, P.O. Box 8447, Hermitage, TN 37076-8447, by May 15, 2017. Alternatively, you may make changes directly on this form and return it by fax to (215) 982-6302.

NOTE: If you submit corrections to us after that date, you may be required to file Form 8082, Notice of Inconsistent Treatment or Administrative Adjustment Request, with the IRS.

THE SCHEDULE IS NOT PROOF OF OWNERSHIP

THE SCHEDULE IS NOT PROOF OF OWNERSHIP						
TRANSACTION DATE		CTION	BROKER OR CERTIFICATE NUMBER	SHARES		
		DATE				
AC	BUY	12/31/2013	BROKER - MAN	10,000		
			END OF YEAR SHARES	10,000		