

Part II Organizational Action *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ _____
Sections 331 and 1001.

18 Can any resulting loss be recognized? ▶ _____
Not applicable. No tax loss is recognized by shareholders as a result of receiving the January 11, 2019 liquidating distributions.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____
Not applicable.

Posted on primary public website in lieu of filing with the IRS, pursuant to IRS Treas. Reg. S.1.6045B-1(a)(3) and (b)(4).