

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ IRC Section 301 (c) (2), IRC Section 316 (a)(1) and IRC Section 852 (c)

18 Can any resulting loss be recognized? ▶ No loss will be recognized

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The information detailed above will be provided in the shareholder's 2016 1099-Div.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here
Signature ▶  Date ▶ 1/31/17
Print your name ▶ Sajal Srivastava Title ▶ President

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|-------------------------------|----------------------------|----------------------|------|---|------|
| Paid Preparer Use Only | Print/Type preparer's name | Preparer's signature | Date | Check <input type="checkbox"/> if self-employed | PTIN |
| | Firm's name ▶ | Firm's EIN ▶ | | | |
| | Firm's address ▶ | Phone no. | | | |