

Part II Organizational Action (continued)

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

Distributions to the shareholders to the extent the corporation's earnings and profit are reported as taxable dividends in accordance with section 316. In an event a distribution to shareholders exceeds corporate current and accumulated earnings and profits under section 312, shareholders must apply the rules of section 301(c) to determine if the distributions are a non-taxable return of basis under section 301(c)(2) or if the distribution is reported as a capital gain under section 301(c)(3).

The issuer is currently expected to have positive earnings and profits and has a deficit in accumulated earnings and profits, where earnings and profits was computed in accordance with section 312.

18 Can any resulting loss be recognized? ▶ N/A

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year is 2016.

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 ▶ 01/13/17

Print your name ▶ Jeffrey Keyes Title ▶ Chief Financial Officer

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.