

# Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

## Part I Reporting Issuer

1 Issuer's name <b>i2 Global, Inc.</b>		2 Issuer's employer identification number (EIN) <b>47-1053457</b>	
3 Name of contact for additional information <b>Investor Relations</b>	4 Telephone No. of contact <b>800-577-1790</b>	5 Email address of contact <b>investor@i2global.com</b>	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact <b>6922 Hollywood Blvd.</b>		7 City, town, or post office, state, and Zip code of contact <b>Hollywood, CA 90028</b>	
8 Date of action <b>8/10/2017</b>	9 Classification and description <b>3.25% Convertible Notes Conversion Rate Adjustment</b>		
10 CUSIP number <b>48123V AC6</b>	11 Serial number(s)	12 Ticker symbol <b>JCOM</b>	13 Account number(s)

## Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ **On August 10, 2017, i2 Global, Inc. ("JCOM") adjusted the conversion rate on its 3.25% convertible notes pursuant to Article 12 of the First Supplemental Indenture Dated June 17, 2014 to Indenture Dated June 10, 2014. Using the parity value method, JCOM's 3.25% convertible notes had a calculated deemed distribution on August 10, 2017 of \$1.607 per \$1,000 principal amount of the notes. Section 301 applies to the deemed distribution by reasons of sections 305(b)(2) and 305 (c) and is taxable to the note holders.**

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ **Provided that the parity value calculation represents fair value, the taxable amount of deemed distribution increases the basis of the notes in the hands of the note holders by \$1.607 per \$1,000 principal amount of the notes on August 10, 2017.**

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ **The amount of the deemed dividend distribution was based on an parity value method as an indicator of the fair market value increase in the conversion ratio. Each investor should discuss the fair value computation with its tax advisors.**

**The conversion rate changed from 14.5422 common shares to 14.5645 common shares per \$1,000 principal amount of the notes. JCOM's common shares are publically traded under the ticker symbol "JCOM". On August 10, 2017, the market close price for JCOM common shares was \$72.08 per share.**

**Part II Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶  
I.R.C. Section 301(c), 301(d), 305(b)(2), 305(c), and 316.

Multiple horizontal lines for providing details for question 17.

18 Can any resulting loss be recognized? ▶ No resulting loss may be recognized.

Multiple horizontal lines for providing details for question 18.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶  
The reportable tax year is 2017 for taxpayers reporting taxable income on a calendar year basis.

Multiple horizontal lines for providing details for question 19.

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 ▶ William J. Hammock Date ▶ Oct. 13, 2017

Print your name ▶ William J. Hammock Title ▶ Tax Director

<b>Paid Preparer Use Only</b>	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.