



**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), Section 316(a), Section 316(b)(4), Section 852(c)

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18 Can any resulting loss be recognized? ▶ Not applicable.

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19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The information provided above is reflected on the shareholders' 2016 Form 1099-DIV.

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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 ▶ *Jonathan Davis* Date ▶ 3/16/17  
Print your name ▶ Jonathan Davis Title ▶ Assistant Treasurer

<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.

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054

