

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. SEC. 301 (c) (2)

18 Can any resulting loss be recognized? ▶ NO

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ THESE ACTIONS ARE EFFECTIVE ON THE DATE OF DISTRIBUTION IDENTIFIED ABOVE.

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 ▶ 3/24/2017

Print your name ▶ RYAN SMITH Title ▶ VP OF TAX

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	JAMES A. OSWALD				P01275389
	Firm's name ▶	PRICEWATERHOUSECOOPERS LLP		Firm's EIN ▶	13-4008324
	Firm's address ▶	300 MADISON AVENUE, NEW YORK, NY 10017		Phone no.	646-471-3000

FORM 8937 - PART II, QUESTION 15 CONT'D

DATE	COMMON STOCK
07/31/2016	100%
08/31/2016	100%
09/30/2016	100%
10/31/2016	100%
11/30/2016	100%
12/31/2016	100%