

Part II Organizational Action (continued)

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

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

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶
The distribution of Series B Convertible Preferred Stock and cash in lieu of fractional shares is reportable for U.S. federal income tax purposes in 2019.

Sign Here	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.			
	Signature ▶ <i>Benjamin Atkins</i>	Date ▶ <i>July 22, 2019</i>		
Paid Preparer Use Only	Print your name ▶ Benjamin Atkins	Preparer's signature	Title ▶ Chief Financial Officer	Check <input type="checkbox"/> if self-employed
	Firm's name ▶			PTIN
	Firm's address ▶			Firm's EIN ▶
				Phone no.