



**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 Sections 1036(a), 305(a) and 368(a)(1)(E).**

18 Can any resulting loss be recognized? ▶ **No loss was recognized in the transaction**

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ **None noted**

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 ▶

7/17/20

Print your name ▶

Andrew Cappennine

Title ▶

CFO & CEO

**Paid Preparer Use Only**

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Richard Croghan	Richard Croghan	07/16/2020		P00089862
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