



**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)(2), 301(c)(3), and IRC Section 316(a)

IRC Section 301(c)(2) provides that the portion of a distribution which is not a dividend shall be applied against and reduce the adjusted basis of stock. IRC Section 301(c)(3) provides that to the extent the amount of the nondividend distribution exceeds the shareholder's basis in the stock, the excess amount will be treated as a gain from the sale or exchange of property.

IRC Section 316(a) defines a dividend as any distribution of property made by a corporation to its shareholders out of its earnings and profits accumulated after February 28, 1913, or its earnings and profits of the current year.

**18** Can any resulting loss be recognized? ▶ No loss will be recognized as a result of any nondividend distributions.

**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ \_\_\_\_\_

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 ▶ /s/ John T. Perri Date ▶ December 8, 2017.

Print your name ▶ John T. Perri Title ▶ CFO

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
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