

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ **Internal Revenue Code ("IRC") Section 301(c) states that the portion of the distribution which is not a dividend shall be applied against and reduce the adjusted basis of the stock.**

Blank lines for providing applicable Internal Revenue Code sections and subsections.

18 Can any resulting loss be recognized? ▶ **Pursuant to IRC Section 311, a distributing corporation will not recognize a loss on a non-liquidating distribution of property. A shareholder receiving a non-liquidating distribution of property from a corporation will not recognize any loss on such non-liquidating distribution of property.**

Blank lines for providing information regarding loss recognition.

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

Blank lines for providing other necessary information.

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 ▶ *Leah Marsaglia* Date ▶ *2/17/2017*
Print your name ▶ **Leah Marsaglia** Title ▶ **VP & Controller - Corporate Accounting**

Paid Preparer Use Only	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.