

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 331 and 1001](#)

18 Can any resulting loss be recognized? ▶ _____

[Not applicable. No tax loss is recognized by shareholders as a result of receiving the October 1, 2014 liquidating distributions.](#)

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

[Not applicable](#)

Posted on primary public web site in lieu of filing with IRS, pursuant to IRS Treas. Reg. S.1.6045B-1(a)(3) and (b)(4).