

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 301 and 301(c)2

Blank lines for listing Internal Revenue Code sections and subsections.

18 Can any resulting loss be recognized? ▶

Blank lines for indicating if a resulting loss can be recognized.

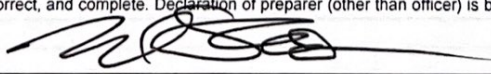
19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶

Blank lines for providing other information necessary to implement the adjustment.

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 ▶

3/15/22

Print your name ▶ Michael Riccio

Title ▶ CFO

Print your name ▶

Title ▶

Paid Preparer Use Only

Print/Type preparer's name

Preparer's signature

Date

Check if self-employed

PTIN

Firm's name ▶

Firm's EIN ▶

Firm's address ▶

Phone no.

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054