

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 Sec. 301(c)(2)

18 Can any resulting loss be recognized? ▶ _____
N/A

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____
Reportable for tax year 2024

Sign Here 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.

Signature ▶  Date ▶ 1/22/2025

Print your name ▶ Gabriel Wasserman Title ▶ Chief Accounting Officer

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Michael Brescia		1/22/2025		P01795741
	Firm's name ▶ KPMG LLP	Firm's address ▶ 345 Park Avenue, NEw York, NY 10154-0102		Firm's EIN ▶	13-5565207
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