

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 2019

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 ▶ January 31, 2020

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
	Stephen Russell		01/24/2020		P01697488
	Firm's name ▶ KPMG LLP	Firm's EIN ▶ 13-5565207		Phone no. (949) 885-5400	
	Firm's address ▶ 20 Pacifica Suite 700 Irvine, CA 92618				